

The Forest Futures Visioning Process Technical Steering Committee disseminated its Draft Recommendations to the public seeking feedback. The comment period closed on February 22, 2010. One opportunity to comment was through email submissions to an email address established for the process by the Massachusetts Office of Dispute Resolution & Public Collaboration. Email and contact information has been redacted due to complaints about unsolicited email contact by some individuals. This document compiles the email comments, in the order received, **on February 21, 2010.**

From: Ed Klaus [REDACTED]  
To: MA Office Disp Resolution

Sent: Sun 2/21/2010 10:39 AM

Cc:

Subject: Forest Management

Attachments:

[View As Web Page](#)

I believe your intent is to stop all logging, and putting us small businesses OUT of business.  
Ed Klaus,  
Pine Shadow Farm

From: dbotellomorin@ [REDACTED]  
To: MA Office Disp Resolution

Sent: Sun 2/21/2010 10:41 AM

Cc:

Subject: Response to Forest Future Vision public comment

Attachments:

[View As Web Page](#)

1. At a time when reducing our carbon footprint is so important, a greater reliance on the local public forest resource is needed. By calling for huge increases in the percentage of acreage to be placed in forest reserve, our state's population will create a larger carbon footprint as we shift our consumption burden to other states and countries. The percentage of land in forever wild should be no greater than 10-15%.
2. Balancing the forest structure for ecosystem biodiversity requires as much area in early succession habitat as in large forest forever wild reserves. Early succession habitat is the forest stage ( which is sorely lacking in Massachusetts) that is in need of enhancement with areas between 15 to 20 acres in size.
3. Disagree that all forest harvest plans be reviewed and approved by a licensed forester. Landowners have a right to manage their land for whatever purpose as long as it does not adversely affect rare and endangered species and water quality.
4. Management approaches for woodlands should allow harvest patches up to 3.0 acres to insure biodiversity and encourage intolerant species.
5. DCR should be harvesting a much higher percentage of woodland growth, not the planned 25%. If the consumption of forest products and the generation of these goods cannot be brought into a better balanced framework, then the steering committee should be creating a format to restrict forest products from being used by people. It is simply hypocritical to consume the supply of forest products generated in other areas of the world and call ourselves "green".

6. The forest management approach concerned with silviculture is one-sided. All the tools and techniques in the forester's handbook should be available...not just shelterwood and removal of overstory after regeneration has established itself.

From: [Phil Benjamin](#) [REDACTED]

Sent: Sun 2/21/2010 10:43 AM

To: [MA Office Disp Resolution](#)

Cc: [REDACTED]

Subject: FFVP

Attachments:

[View As Web Page](#)

Good Morning,

I would like to take a few moments to add my voice to the on-going Forest Futures Visioning Process regarding the Technical Steering Committee Draft Recommendations.

It is obvious the TSC has devoted an exceptional amount of time and energy in its preparation of the Draft Recommendations. It is also obvious that their efforts have resulted in a tremendous amount of reaction and response, both during the hearings held through portions of the state and in written emails and letters. The responses, in particular from the Massachusetts Chapter of the Society of American Forester, the Yankee Chapter of SAF, and the Massachusetts Forest Landowners Association, seem to clearly and succinctly articulate the concerns that many of us in the forest management business in Massachusetts share. In addition, there are several concerns I feel compelled to share with the MODR as the deadline for comments quickly approaches.

I am very dubious of the TSC's proposal to rezone DCR's holdings into three separate categories. I believe it is both very short sighted and ill advised to create Forest Reserves to the extent proposed by the TSC. This particular recommendation could be construed as a "knee jerk" reaction to the highly visible and vocal component of the state that is committed to the prohibition of any "commercial harvesting" on state land.

I am most certainly in favor of the creation of Forest Reserves throughout the state where current conditions warrant protection, whether they be particular ecological systems, habitats that support rare or threatened plant and/or animal species, or simply provide landscape conditions not found anywhere else in Massachusetts. My concern is the arbitrary allocation of DCR acreage towards this purpose. It seems to me that DCR should continue to work with the various land protection organizations throughout the state where lands of different ownership, private, municipal, state, and/or nonprofit could be combined to create the type of Forest Reserves that maximize the features most desired for the various Reserves. This approach would be based on the scientific expertise of the many stakeholders involved with a particular Reserve. Simply designating a significant portion of DCR's holdings as Forest Reserves with the intent to prohibit "commercial harvesting" is not the answer.

It does strike me as somewhat disingenuous that the TSC's goal for the Forest Reserves is allowing the natural processes to occur without human intervention, up to a point. Although it might be decided that some degree of human action may be warranted in response to a particular natural event, it appears that "commercial harvesting" would always be prohibited. If the intent of a Forest Reserve is to allow Mother Nature, so to speak, to guide the growth and development, then maintaining a "hands-off" approach should be consistently applied. Selectively deciding which human intervention is appropriate and which is

not does not support the desired goals for the Forest Reserves.

Another point used to support to creation of the Forest Reserves focuses on the management of the TSC-designated Woodlands. These DCR Woodlands would be used to demonstrate "excellent forest management" and serve primarily as models for sustainable forest management that would be carried out on privately owned and other non-DCR woodlands. First of all, I believe it is presumptuous of the TSC to assume DCR's role is providing leadership in and demonstrations of sustainable forest management. I firmly believe there has been in the past and can continue to be a healthy and admirable flow of information and ideas back and forth between DCR, the private sector, and the academic sector. Secondly, the DCR woodlands have historically and consistently served as a source of forest products. These sustainably managed forests are a crucial cog in the local economies that are situated near the DCR lands. Although their contribution to the overall state economy is minuscule, it does not decrease their importance to the families and small businesses that depend on the availability of timber and other forest products for their livelihoods.

Although it does not appear any type of economic analysis of the TSC's recommendations has been carried out to date, there does seem to be an assumption in the draft recommendations that management of the non-DCR woodlands will compensate for the potential loss of forest products harvested from DCR lands targeted for designation as Forest Reserves. Despite the large percentage of privately owned woodlands in Massachusetts, those woodlands landowners are willing and interested in managing are actually not as extensive as one would prefer. There are many privately owned forests that landowners simply have no interest in managing. Therefore, the assumption that the private sector will pick up the slack in the production of forest products as the management of DCR lands decreases is most assuredly much too optimistic. The forest products industry in Massachusetts, although modest in scale, does in fact contribute to the local economies around the state and I am not confident loggers and sawmills can afford to lose another source of locally managed forest products.

Lastly, I question the need to reinvent the wheel, so to speak, with the structure of DCR. From my long-time viewpoint in the private sector, it seems that DCR has been suffering from both a lack of funding and a lack of credible leadership. With the state budget in disarray for much of the past decade, the workloads of the remaining DCR foresters have been stretched close to the breaking point. With so many responsibilities placed on so few DCR foresters, it is not surprising that there have been episodes of mismanagement that have not reflected well on DCR's mission. There has also been a gaping void in leadership at DCR that could and should be addressed with the hire of a new Chief Forester. This individual needs to have the experience and scientific background to serve this position well. Providing positive and open communications with the DCR foresters while having the support of those higher up the ladder of command in DCR and the EOEA is crucial. Maintaining an open line of communications with the public is also invaluable. The public does not like surprises, especially when it involves our landscapes and our forests. Perhaps the situations that have led to creation of the TSC and its mission could have been avoided altogether if DCR had had a Chief Forester in place and a willingness to support the mission of DCR.

I want to thank you for the opportunity to weigh in on the TSC's Draft Recommendations as part of the FFVP. I realize this process will in all likelihood continue for some time. I am hopeful that many of the thoughtful comments and suggestions that have been submitted to the MODR and the TSC will be carefully considered. I look forward to the ongoing discussions and the eventual resolution of the TSC's mission.

Philip B. Benjamin, CF  
Mass Licensed Forester # 15  
Benjamin Forestry Services, Inc.  
[REDACTED]  
South Easton, MA 02375

[REDACTED]

From: Lionel Audette [REDACTED]

Sent: Sun 2/21/2010 11:09 AM

To: MA Office Disp Resolution

Cc:

Subject: State Woods

Attachments:

[View As Web Page](#)

I love to walk in the woods. I need to be in the woods occasionally. Keep the woods as woods please. It's the only thing we got around that is natural, real, and Godlike.

Thanks,

Lionel Audette

From: dimaio [REDACTED]

Sent: Sun 2/21/2010 11:39 AM

To: MA Office Disp Resolution

Cc:

Subject: Jim DiMaio Forest Vision Comments

Attachments:  JDiMaio Forest Vision Comments.docx(32KB)

[View As Web Page](#)

MODR:

Attached is a file containing my comments in response to the recently released draft DCR Forest Vision process.

Jim DiMaio

February 20, 2010

James N. DiMaio

[REDACTED]  
West Brookfield, MA

01585

DCR Forest Futures Visioning Process Comments

c/o MODR

University of MA Boston

100 Morrissey Boulevard, M-1-627

Boston, MA 02125

## **Re: DCR Forest Futures Visioning Process Comments**

I respectfully submit the following comments as a Massachusetts' private concerned resident having approximately 39 years of international, national, and Commonwealth professional natural resource experience. I appreciate the opportunity to comment on the future of Massachusetts critically important State Forests.

### **General Comments:**

I voice extreme disappointment in the report, vision, and recommendations due to the appearance of premising the document on unsubstantiated public opinions, assumptions, and processes or not recognizing current DCR accomplishments or processes that are aligned with the recommendations.

I found that the draft recommendation public participation process was lacking and less rigorous than existing DCR Forest Resource Management and Ecoregional Planning efforts because vision process 30 day comment period was too short and the public meetings did not adequately provide the public a proper venue and opportunity to provide meaningful feedback.

The vision and recommendations did not include feasibility of implementation or economics information.

The process resulted in a further breakdown of competing interests. This should be fully recognized and understood that reaching consensus and pleasing everyone is highly unlikely. DCR should be recognized for working with the public professionally and rigorously trying to reach informed consensus. There appears to be little or no public and DCR employee support for the report, vision, and recommendations, thus major changes are necessary.

The report and recommendation is perceived to be based on present "not in my backyard" social 100 year needs and inadequately incorporates global, futuristic (thousands of years) perspectives, and uncertainties.

### **Areas of Similar Concurrence:**

I do not agree with the wording in Recommendation #3 calling for the "prevention of further fragmentation" which is unrealistic. However, I concur that it is imperative that key forestland be permanently protected from development through private landowner conservation easements/restrictions. The cost of protecting these forestlands need to be transparent and the timeframe for reaching the goal realistic.

The Commissioner "State Forester, with bonafide, natural resource credentials and appropriate licenses, needs to be directly responsible for state and private forest and forestry programs.

### **Areas that Currently Aligned within DCR:**

DCR Ecoregional Assessments and Forest Resource Management Plans are based on Ecosystem Management and Adaptive Management documented and proven sustainability principles. There are no

such planning principles based on ecosystem services. Ecosystem services flow from all forestlands based on Ecosystem Management. Suggest recognizing that DCR correctly uses Ecosystem Management and Adaptive Management Principles.

### **Areas of Significant Concerns:**

The report does not recognize or take into consideration the critical nature, circumstances, and therefore the great uncertainty that exists today and in the future of Massachusetts, our nation, and the world. The level of uncertainty includes: climate change; unstable socio-economic and political factors; unsustainable energy, food, and raw material systems; unprecedented threats to our forest in the form of development, unsustainable recreation use, destructive non-native and native forest insects and diseases; unprecedented large and destructive wildland fires; severe natural disturbances; and present and future concerns about the amount and wise use of citizens tax dollars. These profound uncertainty variables were not adequately and/or inappropriately taken into consideration in the development of the report, vision, and recommendations. Frankly, publicly owned and managed forests need a vision that takes into consideration forever and not just the next 100 years.

Careful examination of the public concerns that initiated the process was not properly analyzed to draw accurate conclusions necessary to formulate valid and substantiated recommendations. It should be noted that there are public issues and concerns at every level of government and almost all projects. The number of concerns, that initiated the vision process, was a mere fraction of the total number of forest related activities conducted By DCR in the last decade. The report does not provide information on the specific basis of each complaint and response as to the forest condition, rationale, or remedial, if needed, actions taken to resolve the issues. The controversial issue of dealing with non-native plantations that were dead, dying, blowing down, and of poor condition was avoided.

The report, vision, and recommendations misrepresent and inadequately address the long-term hard change in land use through development; Massachusetts dependence on others for their forest products and by-products, including energy; global ecological and economic ramifications of continuing to rely on others for our basic products including forest products, by-products, and energy; Massachusetts high and increasing carbon footprint; and current in future basic and crisis related sustainability needs. The vision and recommendations do not account for long-term development, disasters, crisis, and sustainability needs today and for future generations. The vision and recommendation appear to be based primarily on present social values for recreation needs, not-in-my backyard mentality, and the continuation forever of others providing Massachusetts all the food, clothing, shelter, and energy needed to sustain life at high standards. I find the vision, report and recommendations calling for between 60 and 90% of the forests in non-multiple use and off limits to commercial uses in forest reserve, wilderness, or parks socially irresponsible, highly contributing towards Massachusetts future inability to provide our residents and contribute to the nation's basic natural resource infrastructure (ecosystem services), and the incorrect balance of basic sustainability requirements, especially in times of crisis and need.

The report, vision, and recommendations do not adequately address the impact of Massachusetts obtaining 97% of its forest products and by-products from afar from a carbon footprint, global ecological and environmental degradation, ethical (use of illegally obtained products), and environmental justice (dependence on the underserved and poor) standpoint. I find it socially unconscionable and unethical to "preserve" an excessive amount of Massachusetts' temperate forest and rely on far-away places, such as, Indonesia, Brazil, Russia, China, etc. to supply wood products that result in deforestation,

significantly increase carbon dioxide level, irretrievably impact others ecosystem services, are illegally obtained (estimated at over 60% of our forest product imports); and harvested and processed by those making sub-marginal wages per day and no health care.

The report, vision, and recommendations frequently misuse or do not properly apply technical terms and do not provide definitions.

The report and recommendations do not adequately take into consideration the forest, their conditions, stand and forest dynamics, and potential treats. For example:

The report and recommendations ignore the recent robust public processes which were completed for Forest Reserves, Ecoregional Ecological Assessments, Forest Resource Management Plans, Green Certification, High Conservation Value Forests, and Forest Harvesting Planning Public Participation efforts. Within the last four (4) years EEO and DCR decisions were made in a transparent, open, fair, and balanced manner.

The amount of Forest Reserves range need to include a low end range of 20% of DCR lands because this was a formal EOEEA decision announced publically in 2006. Public participation meetings and comment periods led to this decision based on a multitude of considerations and factors which were ignored by the report.

Parks were partially identified by the density of trails. High density trail systems that are not or poorly maintained (accurate depiction of DCR's trail system) degrade the ecological and native biodiversity, significantly impact watershed and wildlife value, and are major vectors of invasive species. DCR should not use trail density to define Parks, but as an indication of degraded forests providing diminished ecosystem services needing rehabilitation.

The report and recommendations call for biodiversity. Public lands should champion "native" biodiversity defined as providing for the full range native species.

The recommendation for forest management was a cookie cutter approach and does not recognize the distinct and variable ecoregions which have different ecological conditions such as: terrain, climate soils, vegetation, social, and economic considerations, and natural disturbance patterns. The one size fits all will not work across the varied Massachusetts ecosystems and will not result in the ecosystem services promised in the reports and vision.

The recommendations ignore Dr. Kelty's comment on single tree selection in existing even-aged 60-80 year old stands leading to highgrading and deterioration of forest values and ecosystem services. Single tree selection is often misused in Massachusetts too often resulting in the forest remaining even-aged with varying tree sizes after the so-called single tree selection treatments occurs. Single-tree selection may also result in advanced regeneration that has a low probability of developing into the desired forest of the future.

Over-reliance of uneven-age silvicultural systems may reduce tulip poplar, oak, black cherry, aspen, cottonwood, etc. species, which are important to our landscape and dependant on high levels of sunlight to reproduce.

The recommendation places unsubstantiated 5-acre limit on silvicultural even-aged regeneration treatments. This will contribute to habitat and biological fragmentation of the forest (small patches of treatment across the landscape), inability to address ecological and forest value and needs, including but not limited to, ecological restoration, habitat and regeneration needs, and poor aesthetics over the long run. There are also no provisions for moderate and large-scale events or conditions that may warrant and justify responsible necessary larger scale stewardship efforts.

Most important, the report and recommendations, over the long run, place in high risk, significant and critically important forests (interior habitat, watersheds, and rare species habitat) in a potentially degraded state (see recent Walden Pond report and climate change forest impacts projected for the Northeast). Forest are being overtaken by invasive species (insects and diseases), which causes the permanent displacement of Massachusetts native species and greatly reduces or in the Walden Pond cases eliminates the forest's essential potential to regenerate native tree seedlings. Native and non-native highly destructive insects and diseases have either entered Massachusetts or are predicted in the near future. Climate change as predicted in many studies may adversely and unnecessarily affect our forests due to gross overstocking and inability or lack of pro-active climate adaptation stewardship. The potential for wildland fires will dramatically increase in size and intensity as a result of the buildup of fuels due to "hands-off and Non-commercial management" from prolonged droughts will pose significant threat to the forest, ecosystem services, private forests, air and water quality, public and private property, and human safety, and pose significant need for taxpayers dollars for fire-fighting.

Private lands, urban forests, and shade trees and their critical contributions towards ecosystem services may be highly threatened from state parks, forest reserves, and woodlands due to the inappropriate and poor stewardship of these lands becoming centers and sources of insects, diseases, and wildland fire.

The annual operating costs of paying for the complete range of recommended stewardship for forest reserves, wilderness, and parks will be astronomical (millions of dollars per year), especially as time proceeds and needs increase. At the same time, revenue in the form of Forest Products Trust Funds, employment, services, and secondary benefits to the towns will dramatically decrease. How will DCR pay for boundary location and maintenance, removal of trash, present and increased hazardous tree removal needs, fuels abatements, rare species needs, invasive species inventory, treatment and monitoring, road and trail inventory, analysis, and implementation, etc.?

### **Recommendations:**

The report, vision, and recommendations need to be professional, clinically accurate, and ethical. The use of existing, proven, widely accepted, and documented natural resource planning, implementation, and monitoring principles, procedures, guidelines and policy must be required as the framework for the vision and recommendations. Correct application of principles, procedures, guidelines, policies, and technical terms must be required and be clearly defined.

The report and vision need to take into consideration and be based on the following principles: forest are forever; the highly and likely uncertainty of the future; The need to maintain as much options as possible for the future; present status and trend (hundreds if not thousands of years) of Massachusetts land use development change, carbon footprint, ability to provide for the present and foreseeable sustainability (food, shelter, clothing, energy, etc.) needs of the Commonwealth, and level and need for the Commonwealth to participate in a socially responsible manner for the impact on the ecology, environment, climate, social, economics, etc. of others, especially fragile, rare, and far-away forests and the most underserved communities.

The recommendations should be structured by:

First, the following DCR current natural resource land and stewardship planning, implementation and monitoring principles, procedures, and policies should continue.

Second, the following DCR current natural resource land and stewardship planning, implementation and monitoring principles, procedures, and policies should be modified by...

State the existing specific current natural resource land and stewardship planning, implementation and monitoring principles, procedures, and policies and the modification

Third, the following the following DCR current natural resource land and stewardship planning, implementation and monitoring s principles, procedures, and policies should be changed by...

State the existing specific current natural resource land and stewardship planning, implementation and monitoring principles, procedures, and policies, why the change and the change

I strongly urge that the recently approved (November 2009) DCR Berkshire Districts Forest Resource Management Plans, which was developed from the comprehensive Ecoregional Ecological Assessment be thoroughly presented as the top recommendation because both efforts met public participation expectations, include: the appropriate amount of forest reserves; sets short and long-term responsible and appropriate stewardship direction for all resources, uses, and activities; calls for monitoring; is readily implementable; and economically sound. These plans should be acceptable because they address any real or "perceived" past DCR stewardship fall-downs; adequately provide for future risks and opportunities; based on documented and proven ecological principles and guidelines; included a reasonable and responsible amount of forest reserves (approximately 26% of the forests), called for native biodiversity, placed appropriate emphasis on watershed and aesthetic values, climate change, and carbon sequestration ecosystem service; was predicated on the condition of the land and forest through emulating natural processes, prohibited planned clearcutting, and resulted in a very modest and easily sustainable harvesting goal comprised of two-aged (existing age and young) forest (about .5% annually) with reserve wildlife trees, snags, legacy (oldest, largest, most valuable) trees, and adequate small and large woody debris, thinning, and small group selection. Additional true early successional habitat was not planned at this time. The Plan described, in adequate detail, the current situation, desired condition, and included implementation standards for all natural resources, uses and activities at high standard including native biodiversity, trails, roads, invasive species, soil and water, rare species, cultural resources, recreation, aesthetics, etc. The plans called for high implementation standards and appropriate monitoring procedures, such as district management forester reviews, 5-year

implementation effectiveness monitoring and reporting, and most important comprehensive Long-term Ecological Monitoring led by UMass, Amherst and other Natural Resource Scientists. This five-year planning effort that resulted in approved plans should not be readily discarded in favor of an unknown planning process that will be intensely and hotly contested as a result of the visioning process.

It is bothersome that the recommendations lead to letting the forest deteriorate into a poor and public hazardous condition, calls for paying for activities with scarce state or federal tax dollars that could be used for infrastructure, educations, health, etc. for the stewardship of degraded forests with the same equipment used for timber sales.

In conclusion, I urge DCR, MODR, and vision participants to keep options open for future generations, fulfill legislative and ethical responsibility for the sustainable stewardship of public forests, recommend tested, practicable, and affordable improvements and in consideration of Ecosystem and Adaptive Management Principles, balance ecological, social, and economic considerations, and fully embrace the Ecoregional Ecological Assessments and Forest Resource Management Plans and recent DCR public participation policy.

Sincerely,

*/s/ James DiMaio*  
James DiMaio  
Private Citizen

From: John Puffer [REDACTED]  
To: MA Office Disp Resolution  
Cc:  
Subject: Comments on Forest Futures Vision Process  
Attachments:

Sent: Sun 2/21/2010 1:08 PM

[View As Web Page](#)

Members of the Technical Steering Committee:

I support all of the 308,000 acres under discussion to be protected in reserves and parklands.

All state lands should be off-limits for commercial timber extraction, and that includes “demonstration forests”. Protected parklands play a significant role in drawing our citizens and our children closer to nature so that someone will be there to care over the next 100 years. Protected reserve lands are also essential to any vision for the future forests in Massachusetts, as these lands protect biodiversity and provide a vital carbon sequestration function.

The larger reserve areas will provide a “wilderness experience,” while the parklands provide for even more outdoor recreational opportunities. Both contribute tangibly to the physical and mental health of our residents and visitors. The citizens of Massachusetts own these lands, and

they should be managed for the benefit of everyone.

A team of forest ecologists and conservation biologists should dictate the times when it is necessary to cut trees and vegetation in Reserves or Parklands for safety or ecological reasons, and they should rely on both common sense and the latest and best science and practices. Foresters should only be called in to do work that is agreed to be essential. They should not be in charge of plans for the stewardship of our public lands.

There is very little public forestland in northeastern Massachusetts. It takes many years to grow big trees, but only a short time to cut them down. Specifically, please protect Bradley Palmer State Park, Boxford State Forest, Cleaveland State Forest, Georgetown Rowley State Forest, Harold Parker State Forest, and Willowdale State Forest from timber harvesting.

Thank you for your consideration.

Sincerely,  
John Puffer  
Boxford, MA

From: Serrentino [REDACTED]

Sent: Sun 2/21/2010 1:29 PM

To: MA Office Disp Resolution

Cc:

Subject: comments for the Technical Steering Committee

Attachments:

[View As Web Page](#)

To Whom It May Concern:

I would like to provide several comments on the draft recommendations of the Technical Steering Committee of the Forest Futures Visioning Process.

- Increase the amount of land in the reserves and parks categories and decrease the amount in the woodlands category
- Increase protection of wetland resources, especially vernal pools. I have observed that some pools (especially smaller ones) located next to dirt roads in Dubuque State Forest have been partially filled with forest cutting debris, usually branches.
- Although I believe it's currently illegal to use ORVs and dirt bikes in state parks, I've seen damage from these activities and have actually seen people driving off-road in parks, especially at Savoy Mountain. We need adequate enforcement in the parks from illegal activities, especially one as destructive as off-road vehicle use.
- No wood cut from our forests should be sold to biomass plants regardless of their location.
- Initiate a plan to control invasive plants and animals in the parks, and to prevent new ones from taking hold.

I would like to thank the people who served on the Technical Steering Committee and the Advisory Group of Stakeholders. The report was thorough and well thought out.

Sincerely,

Patricia Serrentino  
Wildlife Ecologist  
Greenfield, MA

From: Ronald Nemeth [REDACTED]

Sent: Sun 2/21/2010 2:43 PM

To: MA Office Disp Resolution

Cc:

Subject: Comments On the DCR Forest Vision initiative

Attachments:

[View As Web Page](#)

In general as a private small wood lot owner and a recreational user of state forests, I am opposed to the restrictive cutting measures and the possible trespass restrictions that are being proposed in the DCR Forest Vision initiative. I am opposed for the following reasons.

1. I have been a long time traditional conservationist, who believes in the wise use of renewable resources such as timber in our forests. Other than environmental reasons that are well laid out in our wet land laws or an endangered specie problem, there should be no reason to restrict timber harvest and to use these valuable resources in our society.

2. From a forest diversity aspect, our forests at this time are severely limited in an early successional component and are progressing lower as time goes on. The numbers I have seen are in the single digit percentages. To improve this early successional component or habitat, which in turn is critical for many early successional birds and mammals, there should be more cutting not less. This is best done using even age cutting practices.

3. From a stand point of user access, there should be very few reasons to limit recreational or passive access on our state properties. In a small state with a large population, public access needs to be maximized to allow the public to enjoy the outdoor experience. If no use areas("wilderness") are desired, we presently have in them western Mass in lands owned by the city water companies of Springfield and Holyoke. However, there is no reason for these lands not to be opened up to passive use.

Sincerely

Ronald Nemeth  
Southampton, Mass

From: bbxmastree@ [REDACTED]

Sent: Sun 2/21/2010 4:13 PM

To: MA Office Disp Resolution

Cc: gregory cox; George C. Harrington

Subject: Proposed New Forestry Regulations

Attachments:

[View As Web Page](#)

Dear Sir:

I am writing in opposition to the proposed Forest Vision recommendations for the following reasons:

1. Massachusetts already has one of the most restrictive and comprehensive sets of timber cutting regulations in the United States. To further restrict and burden private forest owners, such as myself, with additional rules and regulations is counterproductive. We should be encouraged to try and keep our woodlands intact and well-managed.

2. Private landowners would be better served by having all of the forestry related parts of DCR transferred to the Department of Agricultural Resources. This make particularly good sense due to the number of woodland owners that are also engaged in other agricultural activities, such as dairy, vegetables, etc.

3. The Forest Vision process should concentrate on the situation with DCR, and not in anyway be expanded to include private woodland owners. There has not been adequate representation of the interests of the private woodland owners in creating these proposals.

Thank you for your consideration of my comments.

George C. Harrington

George C. Harrington, Manager  
Baiting Brook, LLC, Christmas Tree Plantation

[REDACTED]  
Framingham, MA 01703-2012  
[REDACTED]



From: [Melissa and Adam Moore](#) [REDACTED]

Sent: Sun 2/21/2010 5:26 PM

To: [MA Office Disp Resolution](#)

Cc:

Subject: forest futures

Attachments:  [Adam R Moore comment 022110.doc\(53KB\)](#)  [ATT1819692.txt\(103B\)](#)

[View As Web Page](#)

Dear Technical Steering Committee,

I am pleased to submit the following comments, submitted on my own behalf as a citizen and licensed forester. Thank you for the chance to comment.

---

<<Adam R Moore comment 022110.doc>> <<ATT1819691.txt>>

February 21, 2010

Ms. Lisa Vernegaard, Chair  
DCR Forest Futures Visioning Process Comments  
c/o MODR University of MA Boston  
100 Morrissey Boulevard, M-1-627  
Boston, MA 02125

Re: Recommendations of the Technical Steering Committee of the Forest Futures Visioning Process

Dear Ms. Vernegaard:

Thank you for the opportunity to comment on the Recommendations of the Technical Steering Committee of the Forest Futures Visioning Process. As background, I received a Master of Forestry degree from the Yale School of Forestry and Environmental Studies in 1995 and served as the Executive Director and Forester of the Connecticut Forest & Park Association from 2001 until 2008. I am currently a Massachusetts-licensed forester and am the Executive Director of Sheriff's Meadow Foundation on Martha's Vineyard. I submit these comments on my own behalf.

Overall, I view these recommendations with a mixture of enthusiasm and concern. I believe that it is well for the Department of Conservation and Recommendation and the Technical Steering Committee to have worked to create this future vision of the forest. I found the annexes to be helpful reading, especially the piece by Bruce Spencer, the historical information, and the section on the various forest laws and regulations by Kathleen Connolly. The report left me feeling hopeful about the prospects for the forests of the Commonwealth.

I do not believe, however, that the recommendations establish a sufficient basis for withdrawing an additional 80,000 acres of forest from the potential to yield forest products and declaring them reserves. The recommendations unfortunately appear to diminish the role of the forester in the

management of the state forests, diminish the amount of land that can be managed to produce forest products, and limit the silvicultural practices that may be employed. I do not believe that our forests can best meet the challenges to be posed by biomass-fueled power plants and a changing climate if forestry on state lands is made marginal. Perhaps most important, I do not believe the recommendations adequately address the needs and concerns of local forest communities. I live on Martha's Vineyard, a community with a 5,000 acre State Forest in its midst. To date, there has been no communication in our community about the Forest Futures Visioning Process.

#### Recommendation 1

I believe that the development of an "Ecosystem Services Model" for forest management is a good idea. I do not believe, however, that areas designated as woodlands need merely be a subset of state forests, nor that forest management on these woodlands need merely be a demonstration. All of the forests – from shaded hemlock ravines to frostbottoms of gnarled post oaks to plantations of lofty white pines – should be demonstration forests.

#### Recommendation 2

Establishing a "Commissioner of Forest Stewardship" post is a good recommendation.

#### Recommendation 3

I support enhancing the ability of private forests to yield public benefits. I believe that the various Chapter 61 programs should be strengthened. Also, I believe that conservation restrictions should be significantly deemphasized as a means of conserving private forestland. I believe that long-term leases of forestland, where either the landowner leases the land from the public, or where the public leases the land from the private landowner, should be developed and used as alternatives to conservation restrictions.

#### Recommendation 4

The establishment of zones may be helpful in creating sensible management policies for 304,000 acres of land. I believe, however, that the case has not been made for the proposed increase in forest reserves. It is neither clear why 80,000 acres of existing DCR lands should be added to forest reserves, nor is it clear why an additional 90,000 to 130,000 acres should be acquired. Why should these lands be reserved? Where would these reserves be located? How would such reserves benefit their host communities and the commonwealth as a whole?

Also, I believe that woodlands should indeed serve as demonstrations of sustainable forestry, but this should go without saying. Where the goal of woodlands management is stated as being to demonstrate sustainable forestry, the goal instead should be to practice sustainable forestry.

#### Recommendation 5

I disagree with the recommendation regarding forest reserves that, when in doubt, or when there is disagreement, the default prescription should be to do nothing. If nothing is to be done in a particular area of forest, there should be a reason for doing nothing. If the woolly adelgid destroys a hemlock grove, there is a good case to be made for removing the dead trees, and another good case to be made for letting them fall in place and rot into the ground. There is not a good case to be made, however, for telling the public that the dead trees are being left in place because ecologists and foresters could not agree on what to do with them. I am reminded of what Theodore Roosevelt said on this subject:

In any moment of decision the best thing you can do is the right thing, the next best thing to do is the wrong thing, and the worst thing you can do is nothing.

I do agree with prohibiting ORVs from forest reserves and from other forest areas as well. I believe that a Science Advisory Board could be helpful.

#### Recommendation 6

While I believe that commercial timber harvests should not normally occur in parklands, I do not believe that they should never occur. Perhaps there is an occasion where a commercial timber harvest should occur in a parkland and be properly planned for.

#### Recommendation 7

I disagree with the zoning of woodlands into Levels 1, 2, and 3 areas and with the limitations on silvicultural practices and on the sizes of these practices. I believe that these recommendations place restrictions on the judgment of the forester that are too severe. Furthermore, any spatial forest zoning or rules must account for the change in the growth and composition and value of that forest over time, and it is not clear that the recommended zoning and limitations are designed to change over time. Also, while it is good practice to leave the tops and branches of felled trees in the woods, there may be reasons in some cases to remove the whole tree. An absolute prohibition against whole-tree harvesting is unwarranted.

#### Recommendation 8

I agree with this recommendation. It makes good sense to review DCR's organizational structure, decision-making and planning.

#### Recommendation 9

I agree that DCR must do a better job of engaging the public in the management of DCR forests. The Manuel F. Corellus State Forest is very important to the residents of Martha's Vineyard. Simply by existing as forestland, it provides wildlife habitat, provides hunting and recreational opportunities, protects rare species and protects public water supplies and aquifers. Island residents and visitors enjoy and appreciate the forest, yet they are also very concerned about its management. Specifically, the forest poses some degree of fire risk to most of the population of Martha's Vineyard. Despite the importance of the forest and local interest in it, there has been no information on the Forest Futures

Visioning process disseminated locally. This is unfortunate, and serves neither DCR, nor the community, nor the forest.

#### Recommendation 10

I believe that local communities must be included in discussions of needed resources.

I thank the Technical Steering Committee for its work on the Forest Futures Visioning Process and for its dedication to the forests of the commonwealth. I would be pleased to provide further comment, if desired, and would be pleased to become more involved in this process. Thank you for the opportunity to comment.

Sincerely,

Adam R. Moore

Chilmark, Massachusetts

King's broad arrow

Connection to local communities

Biomass plant

Connection to foresters

From: David R. Foster [REDACTED]

Sent: Sun 2/21/2010 6:04 PM

To: MA Office Disp Resolution

Cc:

Subject: Forest Futures Comments

Attachments:  DCR Future Vision and Beyond.doc(91KB)

[View As Web Page](#)

I applaud the significant effort.

Comments attached.

David R. Foster  
Director  
Harvard Forest, Harvard University  
[REDACTED]  
[REDACTED] Petersham, MA 01366 USA  
<http://harvardforest.fas.harvard.edu>

---

<<DCR Future Vision and Beyond.doc>>

## Massachusetts Forest Futures

### Seizing an Historic Opportunity for Conservation

Comments by David Foster

February 21, 2010

The Forest Futures process is an important *first step* in defining critical directions for the conservation of all forest lands in Massachusetts. Commissioner Rick Sullivan should be commended for initiating and strongly supporting a process that made significant strides thanks to an all-volunteer TSC that brought great depth and breadth of experience to a lengthy and time-consuming effort. Meanwhile, the AGS and many active citizens have served important roles by raising questions, challenging the process and committee on many levels, and greatly enhancing the level of public awareness and engagement. While

the process has not met any of the parties' full expectations, and many details remain to be addressed, the emerging vision is bold and far-reaching: (1) to protect at least 50% of the state in forest; (2) to designate legislatively many large reserves across the range of environments in the state; and (3) to improve stewardship on all forest lands across the Commonwealth.

Nonetheless, despite these strides, the Forest Futures process runs the great risk of devolving into a series of distracting and intractable arguments about specific management issues on a limited, albeit important, portion of the States forests. These discussions will remain intractable until **all State-managed lands are reviewed collectively**.

Meanwhile, **endless arguments about State lands management threaten to distract attention and resources from the single largest threat to forests in the Commonwealth: the relentless deforestation and development of private forest land** (cf. Kittredge 2009). This preeminent issue is completely unaddressed in the report.

The hot button issues – clearcutting, watershed management, number, size, location and total extent of reserves, certification – need to be addressed across *all* State lands. At the same time through complacency we are all (public leaders, agencies, conservation organizations, citizens) squandering the natural infrastructure contained in our magnificent but continually declining forests. It is imperative that EEA *and* major (and local) conservation organizations collaborate with unprecedented vigor to (1) protect every possible acre of private forest land, (2) act at a landscape and regional scale to designate reserves and (3) enhance active forest management across public-private ownerships.

While much U.S. and international conservation effort targets REDD (Reduced Environmental Degradation and Deforestation) in tropical areas, REDD is active, but largely ignored, in our backyard and across New England. Annually, vast forest areas are destroyed, intact natural landscapes are fragmented and perforated by development and intensive management, and poor management reduces many values in remaining forests. Today, the mitigation of climate change, reduction of energy consumption, and improvement of local and statewide economies are of foremost concern to policymakers. The forests of Massachusetts and New England need to be recognized as critical elements in: (i) addressing these problems; (ii) meeting state goals in redefining the economy, transportation and resource use; and (iii) forging an environmentally sound future for society. The forests of Massachusetts have never been more important (Barringer 2009, NEGC 2009, Foster et al. 2010).

The following perspective addresses issues in the Forest Futures Vision and outlines approaches for the state, its conservation partners and its critics to build on this visioning process.

### **Enhancing Regional and Statewide Conservation**

In partnership, the state, conservation organizations and the many Regional Conservation Partnerships (see Wildlands and Woodlands Partnership) should seek to:

- Rapidly increase the efficiency and rate of private forest land protection through conservation restrictions and targeted purchases to reach a goal in which *at least 50% of the state* will remain forested in perpetuity.

- Advance regional landscape conservation in which large continuous blocks of forest and agricultural lands are protected and large reserves are designated and managed across multiple public and private ownerships.
- Identify the most effective opportunities to support private conservation activities: e.g., through cost-sharing on conservation restrictions, appraisals, surveys, estate planning, ecological mapping, trail development, and the development of long-term management plans, all of which provide public benefits.

<sup>1</sup> Examples: Pioneer Valley Land Trust Group, North Quabbin Regional Landscape Partnership, Mass-Conn Sustainable Forest Partnership, West Suburban Conservation Council, Taunton River Coalition

Regional Conservation Partnerships<sup>1</sup> and other regional efforts by major conservation groups provide powerful partners for state agencies. Local groups and individuals (including private foresters) in RCPs have intimate knowledge of communities, landowners and local conservation priorities and provide grassroots energy and support. Meanwhile, large conservation organizations (e.g., MAS, TNC, TTOR, NEFF) and some private landowners (e.g., Harvard University, Whetstone Woods, Hull-Peck, W.D. Cows) own or influence substantial lands that, if protected from development and managed in concert with state and other private lands, vastly increase the effectiveness of active forest management and the area and value of reserves. These private efforts leverage, focus and increase the efficiency of state energy and resource allocations.

### **Enhancing Resources for Conservation**

Increasing the rate of land protection and enhancing stewardship on private lands requires the efficient application of increased resources. Specifically, funds are needed for the purchase of conservation restrictions; the due diligence and preparatory activity involving private landowners (appraisals, surveys, estate planning, ecological mapping and assessment, development of management plans); landowner education; the monitoring of conservation restrictions; and support of RCPs. These could be obtained through:

- Significant reallocation of State staff from State land management and planning to private land protection, outreach and stewardship (often in partnerships with RCPs)
- Partnering with organizations on regional and state-wide conservation by leveraging funds internal to all entities and from additional federal and philanthropic funding.
- Supporting (and having the Governor appoint!) the Legislative Special Commission on Conservation Finance. Guided by James Levitt from the Harvard Forest Program on Conservation Innovation and with support from the Massachusetts Environmental Trust, the Advisory Board to the Financing Forest Conservation (FFC) initiative is critically reviewing the most promising sources of new capital for conserving the Massachusetts forests. The FFC report will be presented to the Special Commission to assist its deliberations.

### **Enhancing the Efficient use of Conservation Resources**

---

State agencies, personnel and resources will remain a major force in statewide conservation. Nonetheless many aspects of conservation outreach, action and research are most effectively advanced through public-private partnerships supported with focused state resources and personnel. Examples include:

- **Regional Conservation Partnerships.** Part-time support of coordinators to 5-10 RCPs statewide would enable these highly effective collaboratives to apply local knowledge and energy to regional conservation outreach and action. Targeted outreach to landowners through RCP members would greatly increase the success rate of engagement landowners in long-term stewardship.
- **Keystone – Advancing conservation by transferring information and ideas to landowners and decision-makers.** This highly effective program run by UMass Extension uses academic, private and state experts to educate key community leaders and players on broad aspects of land protection and stewardship.
- **Private Foresters.** In many situations, especially where public-private partnerships are advancing conservation across multiple ownerships it will be more efficient and cost effective to contract with private foresters.
- **Statewide and Regional Conservation Planning.** Recent experience has shown that private organizations and academia can bring critical tools, information and resources to identify and advance land protection and management. Example include: *Reserve Planning and Identification of Large and Critical Blocks of Land* (TNC and UMass NCR); the *Statewide Land Conservation Plan* (many private organizations and state agencies) and *Digital Archiving and Analysis of Forest Harvest Data* (i.e., Chapter 132 Forest Cutting plans; Harvard Forest, UMass NCR and DCR).

## The Rationale for Management

The single significant weakness of the Forest Futures report is the absence of accompanying rationale for specific management objectives and targets, including: reserves; even-aged management for early successional habitat; watershed management; invasive species; and the use of fire. Below, are my personal thoughts on these subjects, many of which are elaborated on elsewhere. (see <http://harvardforest.fas.harvard.edu:8080/exist/xquery/pb-pdf.xq>)

## Continuing and increasing the management of forests in the Commonwealth

While it may be tempting to consign all State forests to reserve status and encourage wildlands preservation on private lands, this quite natural inclination suffers from what Mary Berlik (2002) called “The Illusion of Preservation”. Massachusetts is a wood-consuming state that is among the most heavily forested in the U.S. Currently we produce something less than 5% of the wood products that we consume; the rest come especially from other countries where environmental oversight is less rigorous and the forest ecosystems are more fragile than our own. By managing more of our forests more intensively we could reduce our dependence on external suppliers and decrease the global conservation consequences. More importantly, we might use this action to underscore the importance of forests and

encourage the conservation of resources through increased recycling and an overall reduction in consumption. Done well, active management could continue to provide many other benefits including carbon storage and climate mitigation.

### **Even-aged management and successional habitat management**

This approach to management is completely legitimate: from aesthetic, human subsistence and biodiversity perspectives there are many arguments for active and intensive management for pastures, heathlands, grasslands, scrublands, savannas, and young regenerating forests. In many parts of New England and globally these landcovers comprise highly regarded and traditional parts of iconic landscapes. But, from the perspective of conservation it is essential to understand the history of these traditions, the rationale for these landscapes and their management, and their appropriate place in the landscape. Above all, in a heavily forested region like New England it is essential to fit this management approach into landscapes while avoiding conflicts with other ecological objectives such as retaining large continuous blocks of forest and designating and buffering large reserves.

**Successional habitat management seeks to restrict the natural tendency for land to develop into forest; consequently it is intensive, requires regular and repeated application of human, mechanical/fossil-fuel based or animal energy, and is expensive.** It generally has negative consequences in terms of carbon sequestration and site fertility (oftentimes the latter is intentional as nutrient poor sites frequently provide the highest quality habitat for openland species).

In New England this approach to land management is rooted in recent (last two to three hundred years) historical conditions and tradition, recreational objectives (i.e., hunting, wildlife viewing), and targeted biodiversity objectives. Importantly, it is not grounded in or supported by an historical understanding of pre-European natural or Native American processes or landscapes (see discussion on fire below). **The habitat and biodiversity objectives of early successional management seek to maintain elements of Henry David Thoreau's landscape not those of Squanto, Leif Erikson or Governor Bradford.**

When these habitats are conservation priorities and this management approach is applied the following would reduce conflicts with other forest-based objectives:

1. Cease all patch and clearcutting in large forest blocks.
2. Take advantage of existing habitats on lands managed for other purposes such as farmlands, airports, powerline rights-of-ways, and landfills. These lands should be included in statewide goals, their land managers should be educated on ecological objectives and approaches, and, in some cases adjoining state lands should be managed in a complementary fashion.
3. Employ these management approaches on historically open farmland that is currently open or in the early stages of succession.
4. Encourage agricultural preservation and traditional forms of farming to increase this ecologically important habitat e.g., through grass-fed and free range grazing of cattle, sheep, pigs, etc. and the preservation of hill farms.

## **Watershed Forest Management**

**Where the management objective is to produce abundant clean water there is no ecological imperative for commercial forest management.** While much science supports this assertion it is also grounded in a simple observation: one hallmark of every wilderness area (west, north, or east in the U.S.) is clear streams with high water quality. Louis and Bob Marshall and many others recognized this when they fought for reserve status for the Adirondacks watersheds, which supply NYC, a century ago.

**On the other hand, nearly a half a century of effective and creative forest management by Bruce Spencer, Thom Kyker Snowman and their predecessors at Quabbin clearly show that active forest management need not conflict with water management objectives.** Even the barrage of recent patch cuts and maintenance of an extensive road system supporting this harvesting activity are not jeopardizing the quality of water delivered to customers. Quabbin is an immense water body situated in a largely conserved watershed and characterized by coarse, nutrient-poor, acid soils. The reservoir is a well buffered and can withstand considerable harvesting without a significant decrease in water quality.

Over the decades management at Quabbin has been motivated by changing objectives: improvement of wildlife habitat, increase in water production to address drought (by converting former plantations to grasslands in the 60s), and creation of a “protection forest” to minimize damage from disturbance and stress. Under these varied objectives however, the management approach has remained constant albeit with varying silvicultural prescriptions: in all cases there was a need for commercial harvesting. The science connecting management and the stated objectives, including enhanced water production and need for or even existence of what has been called a “protection forest”, was often thin. In contrast, there is ample support for the notion that forest reserves, in which natural processes prevail and forests are impacted by e.g., hurricanes, disease, ice and pests, will continue to produce the highest quality water.

Consequently, if commercial timber harvesting is to be undertaken on watershed lands it should be clearly stated and understood that its objectives are for purposes beyond the production of abundant clean water. These objectives may include income, jobs for local economies, aesthetics, wildlife habitat, research, demonstration, biodiversity and more.

## **Fire and its management**

Bill Cronon, Steve Pyne, Bill Niering and my early writings did a disservice to conservation; they helped to convince many conservationists and land managers that New England landscapes have been actively managed for millennia by Native Americans who lived in established villages, were sustained by corn agriculture, and cut and burned a mosaic of forest and open lands actively and regularly. Unfortunately, none of these authors conducted primary historical-ecological research to back these claims and, there is no evidence to support any of these well-engrained assertions. In fact:

- There is no evidence in New England for a single permanent Indian village before European contact.

- There is ample evidence that Native people lived a dispersed and seasonally nomadic subsistence based almost exclusively on hunting, gathering and fishing.
- It is well documented that corn arrived as a late supplement to Native diets only a few centuries before European settlers.
- All of the evidence indicates that fire was employed much more locally and with much less frequency than occurred once Europeans arrived
- There were no large open upland areas, no large fields, no evidence for savannas and every bit of evidence that old and uneven-aged forests dominated most landscapes, including those deemed “fire prone” such as sandplains.
- Areas like Myles Standish State Forest, Cape Cod and the Islands had much more mesic forests before Europeans arrived. With increased fire, land clearance and logging the “fire prone” species (oak, pine and pitch pine) increased.

Consequently, the case for Native land management, with fire or otherwise, and the need to perpetuate this activity based on some sense of the “natural” prehistorical conditions of the landscape, is greatly overblown. Perhaps 75,000 people occupied New England before 1600 A.D., but their impact on the environment and forests especially, was subtle (cf. the studies by E. Chilton).

Meanwhile, fire is expensive, dangerous, difficult to apply due to air quality and safety concerns, and relentless: to work for stated objectives areas need regular, ongoing burning across immense acreages statewide. At the same time and given its expense, almost none of the fire management conducted today has parallel ecological studies to ascertain whether the stated objectives are met.

I would suggest that most of the fire management being employed today can be placed under the more general objective of maintaining historical (i.e., last two to three hundred years) landscape conditions; i.e., management for openlands and early successional habitat associated with Colonial agriculture and its decline. (Or reduction of fuel loads). These objectives could be met much more readily through mechanical means or the use of grazing animals, supplemented by fire. This approach would more effectively mimic the cutting, harvesting grazing and burning that created these landscapes in the first place.

Finally, there is scant evidence of natural fire in Massachusetts and therefore no reason to hesitate in putting out all fires in reserves or other forest lands.

## References

- Aber, J., N. Christensen, J. Fernandez, J. Franklin, L. Hiding, M. Hunter, J. MacMahon, D. Mladenoff, J. Pastor, D. Perry, R. Slangen, and H. van Miegroet. 2000. Applying ecological principles to management of the U. S. National Forest. *Ecological Society of America. Issues in Ecology* 6: 1-20.
- Barringer, R.E. et al. 2009. Report of the Blue Ribbon Commission on Land Conservation. New England Governor's Conference.
- Berlik, M. M., D. B. Kittredge, and D. R. Foster. 2002. The illusion of preservation: a global environmental argument for the local production of natural resources. *Journal of Biogeography* 29: 1557-1568 and Harvard Forest Paper 26. Harvard University, Cambridge, MA.
- Chilton, E.S., 2000. The archaeology and ethnohistory of the contact period in the Northeastern United States. *Reviews in Anthropology* 30: 55-78.
- Foster, C.H.W. (Ed.) 2008. Twentieth-Century New England Land Conservation, A Heritage of Civic Engagement. Harvard University Press, Cambridge, MA.
- Foster, D. R., D. B. Kittredge, B. Donahue, G. Motzkin, D. Orwig, A. M. Ellison, B. Hall, E.A. Colburn, A. D'Amato. 2005. *Wildlands and Woodlands. A Vision for the Forests of Massachusetts*. Harvard Forest Paper 27. Harvard University, Cambridge, MA.
- Foster, D. R., B. Donahue, D. Kittredge, K. F. Lambert, M. Hunter, B. Hall, L. Irland,  
R. Lilieholm, D. A. Orwig, A. D'Amato, E. A. Colburn, J. Thompson, J. Levitt  
A.M. Ellison, J. Aber, C. Cogbill, C. Driscoll, T. Fahey, C. Hart. 2010. *Wildlands and Woodlands. A Vision for the New England Landscape*. Harvard Forest Paper 30. Harvard University, Cambridge, MA.
- Foster, D.R. and J. Aber. (Eds) 2004. *Forests in Time: the Environmental Consequences of 1000 Years of Change in New England*. Yale University Press, New Haven, CT.
- Foster, D. R., Orwig, D. A. 2006. Pre-emptive and salvage harvesting of New England forests: when doing nothing is a viable alternative. *Conservation Biology* 20: 959-970.
- Kittredge, D.B.. 2009. The fire in the East. *Journal of Forestry* April/May pp. 162-163.
- Levitt, J. N. 2005. *From Walden to Wall Street: Frontiers of Conservation Finance*. Island Press and Lincoln Institute.
- New England Governor's Conference. 2009. *A Lasting Legacy: Recommendations of the New England Governors Blue Ribbon Commission on Land Conservation*. 6 pp. no place of pub indicated.

From: Kim Feener [REDACTED]

Sent: Sun 2/21/2010 7:05 PM

To: MA Office Disp Resolution

Cc:

Subject: Stop the logging in our public parks and forests

Attachments:

[View As Web Page](#)

Protect all state parks and forests from logging. I have lived in northeast Massachusetts all my life, it is my home and I love it here just as it is. The forests are what make it an incredibly beautiful place to live, and because of that beauty I have considered raising my future children here. However, if you allow logging in our state parks all that beauty will be gone, and it won't be my home any longer, nor will it be my children's. Northeast Massachusetts isn't the northeast without it's forests and state parks. Do not work to destroy the home I love.

Sincerely,  
Kimberly Feener

[REDACTED]  
Topsfield, MA  
01983

"Our State parks are a vital treasure for the Commonwealth. By the end of my administration,

I hope each and every park is something that we can all be proud of"

~ Governor Deval Patrick

From: John Puffer [REDACTED]

Sent: Sun 2/21/2010 7:35 PM

To: MA Office Disp Resolution

Cc:

Subject: RESEND: Comments on Forest Futures Vision Process

Attachments:

[View As Web Page](#)

**\*This is a re-sending of a message sent earlier today. I wanted to include my full address and contact information in order to meet any requirements necessary for this letter to be considered.\***

Members of the Technical Steering Committee:

I support all of the 308,000 acres under discussion to be protected in reserves and parklands.

All state lands should be off-limits for commercial timber extraction, and that includes “demonstration forests”. Protected parklands play a significant role in drawing our citizens and our children closer to nature so that someone will be there to care over the next 100 years. Protected reserve lands are also essential to any vision for the future forests in Massachusetts, as these lands protect biodiversity and provide a vital carbon sequestration function.

The larger reserve areas will provide a “wilderness experience,” while the parklands provide for even more outdoor recreational opportunities. Both contribute tangibly to the physical and mental health of our residents and visitors. The citizens of Massachusetts own these lands, and they should be managed for the benefit of everyone.

A team of forest ecologists and conservation biologists should dictate the times when it is necessary to cut trees and vegetation in Reserves or Parklands for safety or ecological reasons, and they should rely on both common sense and the latest and best science and practices. Foresters should only be called in to do work that is agreed to be essential. They should not be in charge of plans for the stewardship of our public lands.

There is very little public forestland in northeastern Massachusetts. It takes many years to grow big trees, but only a short time to cut them down. Specifically, please protect Bradley Palmer State Park, Boxford State Forest, Cleaveland State Forest, Georgetown Rowley State Forest, Harold Parker State Forest, and Willowdale State Forest from timber harvesting.

Thank you for your consideration.

Sincerely,

John Puffer

[REDACTED]  
Boxford, MA 01921

[REDACTED]

From: kfeener@ [REDACTED]

Sent: Sun 2/21/2010 7:47 PM

To: [MA Office Disp Resolution](#)

Cc:

Subject: Protect all state parks and forests from logging

Attachments:

[View As Web Page](#)

I support 100% of the 308,000 acres under discussion to be protected in reserves and parklands. All state lands should be off limits for commercial timber extraction, and that includes ?demonstration forests?. Protected PARKLANDS play a significant role in drawing our citizens and our children closer to nature so that someone will be there to care over the next 100 years. Protected RESERVE lands also are essential to any vision for the future forests in Massachusetts, protecting biodiversity and providing carbon sequestration.

As a taxpayer, I don?t want to pay for logging and timber extraction on state lands. Logging in our public parks and forests is not appropriate. Private lands can supply timber, but they cannot be expected to provide recreation, biodiversity, wildlife corridors, and carbon sequestration like public lands can. The TSC recommendations don?t go far enough to protect these important values of our public lands.

The larger reserve areas will provide a ?wilderness experience? while the parklands provide for even more outdoor recreational opportunities. Both benefit the physical and mental health of our residents and visitors. And the best reason to protect these lands is because we CAN. The citizens of Massachusetts own these lands, and they should be managed for the benefit of everyone.

Common sense and a team of forest ecologists and conservation biologists should dictate the times when it is necessary to cut trees and vegetation in Reserves or Parklands for safety or ecological reasons. Foresters should only be called in to do work that is agreed to be essential. They should not be in charge of plans for the stewardship of our public lands.

There is very little public forestland in northeastern Massachusetts. It takes many years to grow big old trees, but only a short time to cut them down. Specifically, please protect Bradley Palmer State Park, Boxford State Forest, Cleaveland State Forest, Georgetown Rowley State Forest, Harold Parker State Forest, and Willowdale State Forest from timber harvesting.

"Our State parks are a vital treasure for the Commonwealth. By the end of my administration, I hope each and every park is something that we can all be proud of.?"

~ Governor Deval Patrick

Sincerely,  
Kimberly Feener

[REDACTED]  
Topsfield, Ma  
01983

From: Kim Feener [REDACTED]  
To: MA Office Disp Resolution  
Cc:  
Subject: Protect all state parks and forests from logging  
Attachments:

Sent: Sun 2/21/2010 7:51 PM

[View As Web Page](#)

I support 100% of the 308,000 acres under discussion to be protected in reserves and parklands. All state lands should be off limits for commercial timber extraction, and that includes “demonstration forests”. Protected PARKLANDS play a significant role in drawing our citizens and our children closer to nature so that someone will be there to care over the next 100 years. Protected RESERVE lands also are essential to any vision for the future forests in Massachusetts, protecting biodiversity and providing carbon sequestration.

As a taxpayer, I don’t want to pay for logging and timber extraction on state lands. Logging in our public parks and forests is not appropriate. Private lands can supply timber, but they cannot be expected to provide recreation, biodiversity, wildlife corridors, and carbon sequestration like public lands can. The TSC recommendations don’t go far enough to protect these important values of our public lands.

The larger reserve areas will provide a “wilderness experience” while the parklands provide for even more outdoor recreational opportunities. Both benefit the physical and mental health of our residents and visitors. And the best reason to protect these lands is because we CAN. The citizens of Massachusetts own these lands, and they should be managed for the benefit of everyone.

Common sense and a team of forest ecologists and conservation biologists should dictate the times when it is necessary to cut trees and vegetation in Reserves or Parklands for safety or ecological reasons. Foresters should only be called in to do work that is agreed to be essential. They should not be in charge of plans for the stewardship of our public lands.

There is very little public forestland in northeastern Massachusetts. It takes many years to grow big old trees, but only a short time to cut them down. Specifically, please protect Bradley Palmer State Park, Boxford State Forest, Cleaveland State Forest, Georgetown Rowley State Forest, Harold Parker State Forest, and Willowdale State Forest from timber harvesting.

"Our State parks are a vital treasure for the Commonwealth. By the end of my administration,

I hope each and every park is something that we can all be proud of.”

~ Governor Deval Patrick

Sincerely,  
Kimberly Feener  
[REDACTED]  
Topsfield, Ma  
01983

From: Dan Streeter [REDACTED]

Sent: Sun 2/21/2010 7:59 PM

To: MA Office Disp Resolution

Cc:

Subject: FFVP comments

Attachments:  DWS comment.doc(43KB)

[View As Web Page](#)

Please find my comments on the FFVP draft recommendations included below and also as an attached word document.

Thank you for the opportunity to participate.

Dan Streeter

[REDACTED]  
Newbury, MA 01951 [REDACTED] [REDACTED]

-----  
Thank you for the opportunity to comment on the draft report from the Forest Futures Visioning Process.

I have been actively involved in trail stewardship on DCR and other Open Space properties in Essex County for about 20 years, first in connection with the Bay Circuit Trail and for the last 15 years with the North Shore Chapter of the New England Mountain Bike Association as Trail Projects Coordinator. I am also chairman of the Newbury Open Space Committee and a member of the Newbury Conservation Commission. I am commenting on the draft plan as an individual, but can speak with some genuine experience about DCR forests and parks in the Essex County area.

### **Parkland Designation**

Due to growth pressures in recent years and diminished percentages of Open Space in northeastern Massachusetts relative to developed areas, all DSPR lands in the Northeast Region should be classified as Parklands. Spot reserves should be considered only to protect unique and

sensitive habitat or significant archeological and cultural resources.

The recommendations of the AGS on page 102 do not appear to include Harold Parker SF, Willowdale SF, Georgetown-Rowley State Forest, among others, in the totals for "sprawl frontier" parkland acres less reserves. Adding all these omissions to the total results in another 35,000 acres of additional parkland. Also mentioned is a North Shore Reserve of 10,000 acres. Large-scale reserves in the Northeast Region do not appear to offer the type of protection envisioned by the TSC and are not something I support.

The amount of increased recreational use in the region in the last 10 years is very noticeable. From my experience, I would guess the number of visits at any location has at least doubled.

No matter how well managed, commercial forestry on DCR properties in the region has not been nor will it be a positive element in maintaining and enhancing the environment or the visitor experience. With the modern large-scale equipment specified, much damage is done to recreational trail assets and desirable landscape features. The value of promised improvements to facilities from harvesting operations is rarely realized. Financially, contracts in the region cannot even come close to the costs of preparing those contracts for sale or repairing damage done by contractors.

The situation here in the Northeast Region is different than other areas in the State. There is little room for Reserve or Woodland designations.

### **Zone Allocations**

Keeping in mind the need for considerably more allocation to Parkland in Eastern MA, I would recommend the following general guidelines for acreages in each zone.

Parkland	125,000
Reserves	100,000
Forestland	83,0000

This will clearly need to be adjusted based upon further analysis and more detailed categorization, based upon hard data. This process must be open and responsive to all public interests and concerns.

However, Recommendation 4 should be modified to include much more Parkland and significantly less designated Woodland and/or Reserves.

### **Impact of other State and Federal Open Space Property**

MA DFW lands do not appear to be included in the scope of this project. I believe that is a critical omission if those lands and other significant public lands are not included in the

evaluation of the need for specified zones or habitat.

In the Essex County area, DFW controls in excess of 5700 acres of land. Parker River NWR is an additional 4600 acres actively managed for habitat and with very limited trail-based recreational opportunities.

Some portion of these lands may be appropriate to consider as reserves or functioning as reserves. DFW is very active in creation of early-successional habitat, so this may reduce the need to engage in creating that type of habitat on DSPR lands.

DSPR lands need to be evaluated in a regional context that includes all State, Federal, and Land Trust holdings.

### **FSC Green Certification**

Many DSPR lands in the Region are listed as under consideration for FSC certification. This makes no sense since these lands are most likely to be designated as Parkland with very limited commercial forestry activity. Across the state, my opinion is that seeking such certification may not be worthwhile endeavor. In any case, FSC certification should be removed from consideration for the Northeast Region DSPR.

### **Resource Management Planning**

Site-specific RMPs are critical to any hope of effective management for DCR properties. I have needed trail maintenance and development projects stalled as a result of the lack of baseline data. The GOALS plans are still of some value but they are what, 40 years old? Conditions have changed, in many cases, significantly.

Forestry Resource Management Plans do not adequately evaluate all values in DSPR properties, nor do they examine individual properties in enough detail. No commercial harvesting should be done anywhere in the state in the absence of a site-specific RMP.

But apart from forestry issues, we need these RMPs now. Funding and staff resources to complete the mandated RMP process should be allocated as soon as possible.

### **Biomass Harvesting**

Biomass extraction should be severely limited on DSPR lands. Whole-tree harvesting should not be used on DSPR lands.

### **Protect Recreational Trail Assets**

Trails are the door the public uses to discover and appreciate the scenic and natural resources that are valued as our landscape becomes increasingly developed. An engaged public can in turn

become a major player in stewardship and land protection.

Forestry operations in both DCR Parkland and Woodland zones need a well-defined and observed policy for buffering all trails, not just regional or long-distance trails. The 50-foot buffer for trails other than regional trails noted on line 2168 might well be extended to 100 feet for all trails. All too often, timber sales have been planned with more thought to making a project palatable to contractors than preserving valuable recreational resources.

### **Evaluation of Trail Systems**

There is an assertion in line 1366 about using trail density as criteria in determining parkland designation that needs to be reconsidered. Non-system trails should in fact be included with system trails when evaluating trails systems, as they are indicators that the official trail system is not sufficient to meet demand or type of use.

Also, trails in Reserves need to be evaluated as a system. In many cases, the current official system is deficient and needs improvement to achieve basic connectivity needs and sustainability.

DCR has until the last several years not been progressive in developing and managing trail systems to meet the needs of trail users. While there is a new approach to recreational trail management, full and comprehensive evaluations of trail systems are needed in all zones, taking into account deficiencies and making necessary additions and route changes, even in Reserves.

### **Public Process**

As noted in Recommendation 9, this is an area where DCR has fallen short with regularity in recent history. Some useful actions are recommended which I totally support. This recommendation is the key to a meaningful change. DCR needs to actively engage the public (push) rather than hope that the public will react to the meager information provided (pull). I would like to see more specific actions included in this recommendation to insure that the final result of the Forest Futures Visioning Process is one that we can all support and participate in going forward.

### **Director of Forest Stewardship**

Elevation of the current Chief Forester position into a Director of Forest Stewardship position to be equal to Director of State Parks and Recreation is a recommendation I do not support. Instead, the Director of Forest Stewardship should be under the direction of the Director of Parks and Recreation in order to better balance the sometimes conflicting objectives for DSPR lands.

Dan Streeter

[REDACTED]  
Newbury, MA 01950 [REDACTED] [REDACTED]


From: jeffk [REDACTED]

Sent: Sun 2/21/2010 8:27 PM

To: [MA Office Disp Resolution](#)

Cc:

Subject: Forest Futures Visioning Comments

Attachments:  [visions\\_comment\\_final.pdf\(21KB\)](#)

[View As Web Page](#)

To Whom It May Concern:

My comment on the ongoing Forest Visioning Process is attached as a .pdf file.

Thanks for the opportunity to comment.

Jeff Knox  
Conway, Massachusetts

---

<<visions\_comment\_final.pdf>>

2/21/2010

To Whom It May Concern:

Environmental decisions to be made regarding the designation of 308,000 acres of DCR lands as forest reserves, woodlands or parklands must be made in the wider context of the entire forested land area in Massachusetts. This includes private lands, trust and environmental organizations, Fish & Wildlife and watershed lands or approximately 3 million acres of forested land. Ideally, this decision should be made in the context of the northern Appalachian forest, i.e., a land area with boundaries defined by habitats not state lines or park boundaries.

In her presentation at the Amherst Middle School public hearing, Lisa Vernegaard stated that the barred owl does not subscribe to the artificial boundaries set by human efforts at management. Similarly, if the DCR's Forest Vision is truly designed for the preservation and health of natural ecosystems, the relative proportion of reserve, woodland and parkland must consider the total extent of habitats and ecosystems not the boundaries which are convenient for bureaucratic purposes.

Without the inclusion of the F&W, watershed, private, and trust landowners, the DCR vision, although applaudable and sorely needed, is flawed. Basing land-use decisions on the land only under DCR jurisdiction assumes the remainder of the forested land in Massachusetts will be divided up in like manner by all land owners outside the DCR.

For example, if sound ecological research indicates within a certain ecosystem (by this I mean ecosystems which are shared by human and native species) 30% of this area must be reserved to allow healthy functioning of the natural species, and the DCR sets aside 30% of 300,000 acres or 90,000 acres for this purpose, this is really only 3% of the total forested habitat in Massachusetts of 3,000,000 acres. If private landowners also decide that leaving their land in its unmanaged, natural state is beneficial, then this 30% might suffice to protect a critical mass of forest as natural ecosystem.

We know however, that private landowners are bound by economic decisions. Their land is taxed and many view their land as a resource with the possibility of creating income from forest products - no doubt to some landowners, the income to be realized from development is even more tempting. So if the DCR is committed to the preservation of reserves of forests wherein natural ecosystems will develop on their own, it must assume the forests outside DCR jurisdiction will be managed as woodlands - it is there that the majority of early successional habitats will be formed, local forest products will be harvested, and development will continue changing the landscape. There is no need to set aside large areas wherein clear-cutting will create early successional habitat or harvesting of local forest products will benefit the Massachusetts economy however beneficial these practices are. This is already being practiced by the majority of landowners. In fact, just the opposite is true. The real need is to set aside large areas which are protected from the human impulse to utilize natural resources with little regard for the health of the landscape.

It should be noted that the Harvard "Wildlands and Woodlands" proposal designated 248,000 acres as wildlands (reserves). One must assume this number is based on the amount of land which is needed to assure continuation of natural processes within a largely fragmented base of protected land. Because the land which can be protected now (i.e., state land) is fragmented, buffer zones need to be created to insulate these parcels from managed woodlands and more

developed land which introduce habitats driven by human intervention. I will not even broach the subject of invasive species whose propagation is solely due to human activity in the landscape, and whose presence makes the need for buffer zones painfully obvious. The DCR is in the position to make sure these buffer zones exist, making possible ecosystems which probably have not existed for 250 years in Massachusetts!

I believe the DCR should put at least 80% (245,000 acres) of its holdings in reserves. This assures that there is a core of Massachusetts forest land which will be preserved for development of natural ecosystems. The DCR is in the unique position to create this core holding since it has jurisdiction over the majority of state owned forest land and can act immediately and with strong purpose. A bold move like this may trigger visioning processes by other organizations thus further benefiting Massachusetts forests.

Sincerely,  
Jeff Knox

[REDACTED]  
Conway, MA 01431

[REDACTED]

From: Jennifer Fish [REDACTED]

Sent: Sun 2/21/2010 8:53 PM

To: [MA Office Disp Resolution](#)

Cc:

Subject: vision comments

Attachments:  [Comments on the Forest Futures Visioning Recommendations.doc\(37KB\)](#)

[View As Web Page](#)

Thank you for the chance to comment

If you have any questions feel free to contact me.

Sincerely;

Jennifer Fish

## **Comments on the Forest Futures Visioning Recommendations**

**Jennifer Fish, Licensed Forester and Citizen of Williamsburg**

I would like to commend the TSC on the hard work of the past year which has provided a solid framework for public discussion. I believe in the premise of three zones the TCS has envisioned for DCR forests and like the concept of parkland, woodland and forest reserves. Many of the supporting concepts are also laudable such as "policies that keep open a range of management options", a reflection of values or services not provided by private land and "the state should be the guardian of our collective future".

As with any draft document there are sections that could use refining and places where the direction is vague or contradictory which I am confident will be refined in subsequent drafts.

My one overarching concern for this process is in the definition and concept of Woodlands. As was stated in the introduction of the Vision document it is was criticism of DCR's forest management that created the forest futures visioning process; therefore, in my opinion, it is only through clearly defining why commercial harvesting can and should occur on public lands that the conflict over timber harvesting may be lessened.

I challenge the committee to broaden the vision of woodlands to not only be a model of sustainable forestry for private landowners and the public, but to also be a clear example of our societies wood product usage. If it is the responsibility of our government to provide not only for our education, our poor and underserved as well as contribute to our clean air, water and recreational enjoyment why do we shy away from supplying a portion of our timber?

I strongly feel that it is a civic duty to acknowledge our resource use by setting harvesting levels on state lands to a sustainable fraction of our consumption. By doing so the cry of "save our forests" falls not on

the land managers but instead causes each of us to look inside our selves and our consumer behavior to save our forests from harvesting. Through tying harvesting rates to consumption we avoid unfair accusations made toward land managers of allegiance to industry or need to generate revenue. At the same time we can provide the general public a visual result of consumption. We in turn provide a common goal of reducing resource usage. I encourage the committee and other decision makers not to set specific acreage figures to any of the zones until a serious look is given to how much of our wood products our public forests should provide.

As was stated by Alfred Ackerman the first State Forester in 1906, interest in the forest "is so hearty that it tempts some of us to look forward to a time when...the State, the cities and the towns will own forests for the productions of timber and for recreation grounds for the people; to a time when the greater part of the timber and wood supplies used in the Commonwealth will be produced within its borders. All of these things are possible and practicable... but it will take time and hard work on the part of the friends of forestry, and an intelligent interest on the part of private owners and the general public."

If we can supply a solid foundation for the role of timber management on public lands we can provide our public servants a platform from which to guide sustainable activities and be transparent to the general public based upon our stated multiple resource needs. We avoid the cries of those who wish to save the forest from harvesting by focusing on science, education and consumer behavior. And we do not place the burden for our timber use solely on private landowners or other nations.

From: Michelle Duval [REDACTED]

Sent: Sun 2/21/2010 8:54 PM

To: MA Office Disp Resolution

Cc:

Subject: Stop the Logging - Please!

Attachments:

[View As Web Page](#)

Please add my message to all the others you have received.

Just the overall disruption to our valued wildlife should have been enough to cause a rethinking of your logging plans.

Your truly,  
Michelle Duval


From: Joe Graveline [REDACTED]

Sent: Sun 2/21/2010 9:54 PM

To: MA Office Disp Resolution; [REDACTED]

Cc:

Subject: DCR Forest Futures Visioning Process Comments

Attachments:  [DCR Forest Futures Visioning Process doc.doc\(26KB\)](#)

[View As Web Page](#)

Dear Forest Future Visioning Process Personnel,

Please accept my attached letter as my comments on the Forest Futures Visioning Process Comments response. And take into consideration my very unique viewpoint on this very important issue.

Sincerely,

Joseph Graveline

---

<< DCR Forest Futures Visioning Process doc.doc >>

DCR Forest Futures Visioning Process Comments  
c/o MODR University of MA Boston  
100 Morrissey Blvd., M-1-627 Boston, MA 02125  
Via: [MODRDCRFFVP@umb.edu](mailto:MODRDCRFFVP@umb.edu)

February 21, 2010

Dear Forest Future Visioning Process personnel,

My name is Joseph Graveline I am a founding member of a Massachusetts non-profit called The Nolumbeka Project. Our mission is the cultural preservation of the indigenous peoples of New England.

I am writing to you regarding the Massachusetts Forest Futures Visioning Process.

Eastern North America, and most especially the woodlands Massachusetts, haven't until recently, been recognized by archaeologists as a region where early, indigenous people left ceremonial designs in their environment. It has been difficult for many archaeologists to imagine that Eastern Native Peoples once ritualized their landscapes with stone architecture. Through interdisciplinary methods, recent archaeological discoveries have begun to form a new vision of Eastern Native Civilization. The new picture is that of an unexpectedly complex societies with "advanced" technologies going back over 12,000 years. In December of 2008 The US Department of the Interior acknowledged and registered just such landscapes in and around the town of Montague. They did this in opposition to the Massachusetts Historic Commission recommendation to deny that status. The case presented by tribal representatives and historians was significant enough for The Department of The Interior to rule against the MHC.

Scientists, antiquarians and tribal representatives are all working together to help to identify, understand, locate and register these priceless and fragile hidden archaeological landscapes in the woodlands of Massachusetts.

There has been a great deal of discussion and concern in this community of tribal historic preservation officers, archaeologists and historians as to the vulnerability of these very special stone architectural structural landscapes. Recent photos of the Quabin clear cuts show the desecration and destruction of a historical colonial cemetery on a hillside there. The kind of damage that the newer logging operations equipment can do to the unidentified historical stone architecture of the Commonwealth, was spared in the clear cuts of the 1800's by the use of oxen and horses as opposed to the modern skidders and feller bunchers of today. Newer logging operations are destroying these irreplaceable archaeological assets.

I have witnessed a logging operator skid out historical standing stones some which stood 9 to 12 feet high. It is against the Massachusetts law to remove such archaeological features without a permit. I judge most loggers don't recognize or understand the weight of their actions in this kind of situation.

The time has come for the land that is owned by the public to be managed and cared for in a way that contributes the most to doing our share of environmental and historical protection.

I would like to see a program put in place that will bring the tribes and historians into the mix to find a way to identify, register and protect as many of these special hidden landscapes as possible. This can be done through a process of education and cooperation with the logging industries that will offer respect and care for these priceless pieces of history.

Considering that the timber program costs the tax payers money and often leaves a wake of broken landscapes and disturbed watershed areas I am for sever limitations on cutting on State land, and for the elimination of clear cutting permits on state and private land.


It is important that bio-mass harvests are not allowed to take place on our timber lands and state parks in order to protect fish and wildlife habitat, clean air, carbon sequestration, clean water and the recreational opportunities that bring in tourist dollars to our state as well as the preservation of the historical hidden indigenous landscape that is so prevalent in the hills and valleys of Massachusetts.

Please protect all state public forests, watersheds, parks and historical landscapes from commercial harvesting.

Sincerely,

Joseph Graveline  
The Nolumbeka Project

CC: Governor Patric, [REDACTED],  
Ian Bowles, Secretary of Energy and Enviroment, [REDACTED],  
Rick Sullivan Commissioner of DCR Rick [REDACTED]

From: Jesse Weeks [REDACTED]  
MA Office Disp Resolution; [REDACTED]  
To: [REDACTED]  
Cc:  
Subject: DCR Forest Futures Visioning Process Comments  
Attachments:  [STATE FOREST COMMENTS.doc\(41KB\)](#)

Sent: Sun 2/21/2010 10:18 PM

[View As Web Page](#)

## DCR Forest Futures Visioning Process Comments

Dear sir or madam,

I am writing to you regarding the Massachusetts Forest Futures Visioning Process.

Massachusetts currently controls the activities on about 550,000 acres of state publicly owned land, or 11% of its land area. At a time when the world is experiencing deforestation, loss of habitat for wildlife, soil erosion and global warming, I would like the land that is owned by the public to be managed and cared for in a way that contributes the most to doing our share of environmental protection.

A recent University of Vermont study suggests that the best way to maintain carbon sequestering on forested land is to refrain from any harvesting. Comments in the FSC report have concluded that the majority of Massachusetts residents overwhelmingly oppose commercial harvesting on state owned land. Also, as an opponent of biomass power plants, I am concerned about a study commissioned by the state which shows that 56% of likely wood supply available to be burned in these power plants would come from state forests if harvesting is to be continued.

The current recommendations of the Forest Future Vision Process would put aside only about 216,000 acres of Massachusetts land area of 5,000,000 acres in parks and reserves that would be off limits to commercial logging. This would amount to only 4% of the total land in the state. I am requesting that all 550,000 acres under State jurisdiction be set aside from commercial timber harvesting in order to preserve and protect wilderness areas, fish and wildlife habitat, clean water, clean air, tourism income, carbon sequestration, scenic beauty and recreational opportunities in the 3rd most densely populated state of 6,000,000 residents.

Protecting these 550,000 acres would amount to protection for only 11% of the total land area and only 17% of the forested land in Massachusetts which would still provide even less protection than neighboring New York State which has set aside 20% of all of their forestlands in parks and reserves where logging is prohibited. Additionally, considering that the timber program loses money, protecting all these state public lands would be the most prudent economic as well as ecological action.

It seems that at a time when we are asking third world countries to protect 25-50% of their forested land for global carbon sequestering, protecting state public lands would be a modest attempt of doing our fair share. After viewing the photos at [www.maforests.org](http://www.maforests.org), it is clear a

major corrective response is needed now to protect these scarce state public lands for current and future generations.

Please protect all state public forests, watersheds and parks from commercial timber harvesting.

Sincerely yours,

Helen Wisner  
[REDACTED]  
Holden, MA 01520


From: [ellenarn@\[REDACTED\]](mailto:ellenarn@[REDACTED])

Sent: Sun 2/21/2010 10:13 PM

To: [MA Office Disp Resolution](#)

Cc:

Subject: TSC document, public comment attached

Attachments:  [Forestry comments on TSC document 0210,R.doc\(84KB\)](#)

[View As Web Page](#)

Hello,

Attached are my comments regarding the Technical Steering Committee document for the Forest Futures Visioning Process. I would appreciate confirmation that you have received them.

Thank you.

Ellen Arnold  
[REDACTED]  
Upton, MA 01568

---

<<Forestry comments on TSC document 0210,R.doc>>

Page 1 of 4

February 21, 2010

From: Ellen Arnold  
[REDACTED]  
Upton, MA 01568

To: Forest Futures Visioning Process (FFVP)  
Technical Steering Committee (TSC)

Re: Comment period on Technical Steering Committee Recommendations dated January 22, 2010

Dear TSC Members,

First, let me thank you, as well as the members of the Advisory Group of Stakeholders, for the time you have taken from your lives to work on this issue. In the interest of brevity, I have tried to keep my comments focused on the issues most important to me that are raised in the document.

I am speaking as a private landowner, as an abutter to Upton State Forest, and as a person deeply involved and interested in the stewardship of our public lands. Although I am a member of the Board of Directors for Friends of Upton State Forest, my comments are being offered independent of that position.

- **Recommendation 6: Resource Management Plans (RMP)**

**I feel that this is the key to the whole issue.** The legislature was very wise, when they created the Department of Conservation and Recreation (DCR), to require that Resource Management Plans be done for **ALL** DCR properties. Forestry should be only one component of a RMP. An inventory of recreational resources, historic resources, ACEC and areas of critical habitat, wildlife and plant life should be included as well as consideration of current uses, local culture and concerns of abutters and local officials. In your document, you say that RMP should be done for high priority properties. The law requires that they be done for **ALL** properties and I believe that means **EACH** property before any cuts are done on that property. There should be public input on each RMP before it is approved.

You are using forestry as a gauge for high priority. There are properties with endangered historic resources that should be considered as the highest priority. Endangered buildings may not be around in the future unless they are addressed and prioritized in an imperative manner. (I also feel that little consideration was given to protection of historic resources such as cemeteries, stonewalls, cellar holes and other historic features within your document.)

**I would agree that temporarily reallocating personnel and resources to complete RMP would be a worthy goal. I would be willing to support a request to legislators to approve funding for the mandate they gave DCR.**

Page 2 of 4

- **Privately Owned Lands (Recommendation 3)**

**Legislation regarding tax credits for private landowners to do conservation restrictions.** I would also suggest educating all local assessors' personnel to the existence of **all** the available opportunities under Chapter 61.

As a private landowner, I do not feel that any more laws, regulations, restrictions, increased fees or taxes should be placed on them. I am concerned that the committee felt it was in the scope of their mission to address privately held lands. This committee was convened to address violations of the New England Standard and poor forest cuts on public properties managed by DCR, not to mess with the rights of private landowners. Education, tax credits, financial incentives through purchase of timber rights or conservation restrictions are enough. If you want to create more development and loss of private property and private forests, the best way to do that is to place more beaurocratic burdens, fees and taxes on private landowners.

- **Recommendation 4**

The concept of zones for public properties is a good one. There are many opinions about what percentage should be included in each zone and that was addressed in the *Wildlands and Woodlands* plan created by Harvard Forest after years of research. Their percentages seem to be more in keeping with a vision for the next 100 years.

I do not believe that hunting should be excluded or restricted within Reserves. It is a fact of our civilization that we have reduced and/or eliminated many predators requiring hunting to keep a balance between wildlife and human activity. It is also important to prevent overpopulation that results in breeding, over browsing of young trees and to reduce the incidence of infection from such diseases as Lyme.

I would probably be a little more relaxed in my thoughts of what might be allowed in the Parklands designation as defined in your document depending on the local culture and thoughts of abutters. The concept of managing Parklands for recreation and current use is a good one but there may be pockets within the Parklands that could be more actively managed. I understand that part of the concept is that one property might have different areas in different zones.

I think that the *Wildlands and Woodlands* description of this type of property is more specific in that it recognizes the difference between urban, suburban and rural parklands. Although I may be wrong, the perception I took from your document led me to believe that all parklands would be operated under the existing urban parks model.

I would not eliminate the Home Fuel Wood program from Parklands, if it is closely monitored and managed so that it does not interfere with recreational use or cause damage to sensitive areas.

Page 35. I agree that DCR should carefully consider that trails in Parklands should be protected from damage that is caused by OHV use. The properties designated as Woodlands might be more appropriate for OHV use if they are contained to existing logging roads. I would ask that your document make a

Page 3 of 4

recommendation to include the Park Watch program in any Enforcement plan and to make the implementation of Park Watch part of the job performance review of park personnel at all levels. In addition, your document should reinforce the recommendations of the Off Highway Vehicle

Enforcement Working Group by calling for DCR to develop an Enforcement plan to carry out those recommendations. Unless and until effective enforcement is implemented to curb illegal use of OHV in parks that do not meet the criteria for their use there will be continued deprivation to the trails and forests managed by DCR.

- **Recommendation 2**

**Step 1:** Elevating the role of forestry within DCR by creating a position of Director of Forest Stewardship on a par with the Director of State Parks makes sense. The position should be filled with a person who has knowledge of the science of forestry as well as an understanding of the importance of our forests for carbon sequestration, wildlife habitat, watershed protection and public space for passive recreational opportunities. This person should also be sensitive to the need for public input when appropriate.

**Step 2: I am vehemently opposed to the suggestion to create a Commissioner of Forest Stewardship under EEOEA removing it from the DCR umbrella.** The person in charge of forestry should be

accountable to the DCR Commissioner who is also responsible for oversight of our parks, forests and beaches. One of the problems that brought us to the point of the FFVP was a disregard for

the need for communication between forestry at the highest level and those people directly responsible for management of other aspects of our public lands.

- **Fire prevention and suppression**

I would have thought that a member of the Fire Control Community would have been included as a member of the TSC. Keep in mind that many of the properties designated as Parklands will be in areas with a concentrated population density. There may be times when it would be appropriate to manage some of those areas with the concern of fire danger that could threaten buildings nearby.

- **Comments on the public forum process**

I feel compelled to raise issues independent of the document itself to focus on the process. Since a goal of the FFVP was to create trust and transparency, I feel that including these comments is appropriate.

It was my belief that the FFVP was organized to address issues raised by members of the public at DCR Stewardship Council meetings with a no cut moratorium in place for the duration of that process. The fact that a moratorium was in place would prevent me from realizing that there was an expectation to create a vision for the next 100 years. When I read your document, I realized you were trying to do just that. I do not understand how you can expect to accomplish that in the short time you have been meeting. When I heard it said, at the Westborough forum, that your final document would be done within thirty days of the end of the comment period I was appalled. You have been meeting for less than a year. That might be time enough to address the concerns that have been raised by citizens about

Page 4 of 4

forestry practices that were mismanaged in certain instances by DCR. To develop a vision to last 100 years should take months from the end of the first comment period with another comment period followed by more revisions. When you are talking about the next 100 years, you really should be sure

you have it right. I am also curious why a thorough review of the *Wildlands and Woodlands* vision was not undertaken and incorporated into your document? Years of study and science went into that vision.

Having attended the Stewardship Council meetings leading up to the formation of your committees, I heard many times that this process was supposed to create trust and a perception of transparency. I feel that objective was defeated by the way the public forums were managed by Mass Office of Dispute Resolution (MODR). Any progress toward trust you may have worked to create was totally undermined by the so-called "public forums" for "public comment". Although these meetings were well publicized they were not public meetings in the true sense of the word since they were not posted as such in area town halls. I visited both the Westborough Town Hall and the Upton Town Hall within the legal 48-hour posting period. There were no visual postings so I asked both Town Clerks and found that there was no request to post. Comment on a major policy review of a state agency should be done at a true public meeting with a true public record being made with everyone present being able to listen to the comments.

Since the Westborough location was not a public meeting in the strict sense there is no requirement, that I am aware of, that calls for accurate minutes. When I raised that issue at the meeting, I was told that scribes would take notes and report out to all and that their notes would be published as comments. When our leader reported out, her comments were very incomplete and ignored the two most important comments that were "RMP" and "NO FSC". The person taking the notes in our group did very little writing, limiting his notes to one or two words for each comment. Within the forced discussion groups, we were asked to vote on components of the document before there was any discussion. Most of the

people in our group had not even read the document, but had points they wanted to make that were important to them. Without a public discussion with comment, questions and answers, how could people form an opinion for a vote?

I have taken a middle of the road position about this subject from the beginning and kept an open mind hoping to learn more when I went to the forum. Without a true public discussion, I came away with the impression that public opinion does not matter. It left me with the uncomfortable feeling that there is a preconceived outcome to this process and that it is being rushed for reasons that have nothing to do with good forestry.

There are many good people that do forestry work for DCR. If the leadership responsible for managing forestry had demonstrated a willingness to work with members of the public from the beginning, I feel that this issue would never have escalated to the point of a moratorium and public outcry that has damaged public perception of DCR forest practices.


From: Bill Labich [REDACTED]

Sent: Sun 2/21/2010 10:29 PM

To: MA Office Disp Resolution

Cc:

Subject: comments on FFV

Attachments:  TSC letter Labich.docx(23KB)

[View As Web Page](#)

Greetings,

Please accept my comments attached.

Thank you very much!

Best,

Bill Labich

[REDACTED]  
Shutesbury, MA 01072

Bill Labich

[REDACTED]  
Shutesbury, MA 01072

February 22, 2010

Massachusetts Office of Dispute Resolution & Public Collaboration  
University of Massachusetts Boston  
100 Morrissey Boulevard  
McCormack Building, 1st floor, Room 627  
Boston, MA 02125-3393

Re: Department of Conservation and Recreation, Forest Futures Visioning Process

Dear Members of the Technical Steering Committee:

I am writing to thank you for your excellent service to the Commonwealth of Massachusetts and to its citizens and residents, human and non-human. You took on a challenging job and I, upon my second review of the document, am even more impressed and grateful for the care, consideration and, dare I say, humility in which you applied your commitment to the task. I am writing as an interested resident and as

someone who feels linked very much to your vision. My comments are limited to those recommendations for which I felt I had something to offer.

### ***Recommendation 1: Adoption of an Ecosystem Services Model to Guide Forest Protection and Management***

I was struck by your statement, “forest products are just one among many ecosystem services, and must not dominate or diminish the others.” The other services you list on page 20 include carbon sequestration, soil, air and water quality, biological and ecosystem diversity, nutrient cycling, culture, history and spiritual values, public recreation. What I wonder is, do each of these services warrant equal protection? Should we equate spiritual value with the forests’ ability to produce plus specimens for timber? And, can some of these services be rendered in another place without increasing the ecological footprint associated with acquiring them (e.g. of transporting wood from Russia or Malaysia)? In other words, what is the geographical context within which we are seeking to equally value these services? I think that there is this notion inherent in your paper that we can continue to constrain the number of acres of DCR-managed forests under production and that by doing so we get a higher “ecosystem service” value when all is said and done. Is that the running assumption? If it is, I question it.

### ***Recommendation 3: Policies for Privately Owned Forests in the Commonwealth***

*Preventing Forest Conversion and Fragmentation*—I did not see an acknowledgement of the critical role that cities and towns could play in the realization of these actions. Also, I am curious as to whom would the Commissioner of Forest Stewardship liaise with to decrease forest conversion and fragmentation across the Commonwealth?

*Promoting Improved Forest Stewardship on Private Lands*—Woodland council coordinators can and should do more than facilitate meetings. They can assist with any initiative that requires cross-boundary coordination from aggregating carbon credits and land protection projects to encouraging multi-landowner forest management planning, treatments and harvests among smaller ownerships. They can also foster collaboration and coordination of activities that together realize over time a commonly-shared conservation vision among cities and towns, landowners, recreation enthusiasts, land trusts, foresters, businesses, etc.

### ***Recommendation 7: Management Approaches for Woodlands-***

*Model Forest Educational Objectives*—I would think that instead of relying on state lands as being the sole source for examples of excellent forestry, a more interesting and productive model might be one that includes private lands. It could be organized as an annual challenge or competition to find the best example of a well-run shelterwood cut. No, sorry, wait a minute....a group-selection harvest. This would keep state foresters on their toes and help promote and highlight the excellent work of private licensed consulting forests.

### ***Recommendation 9: Improving Public Process***

I have had some experience in providing the public with hands-on forest-based educational programs. A particular set of programs enabled ordinary citizens to participate in the development of a forest management plan and in the treatments that followed on a particular forest. Programs like these could help produce “ownership” by members of the public of forests and for the silviculture and science employed in their care. If the public are not given the opportunity to participate in the joys and concerns of ownership, then future harvest operations

may continue to be a polarizing activity making it more vulnerable to even further constraints.

Thank you again for your diligent efforts and for the opportunity to provide these brief comments. I look forward to reading the final report.

Best wishes,

*Bill*

Bill Labich

[REDACTED]  
Shutesbury, MA 01072

From: Mark DeMaranville [REDACTED]

Sent: Sun 2/21/2010 10:32 PM

To: MA Office Disp Resolution

Cc:

Subject: DCR Forest Futures Visioning Process Comment

Attachments:  ForestFuturesVisioningComment.doc(48KB)

[View As Web Page](#)

To: DCR Forest Futures Visioning Process Comments

From: Mark DeMaranville, Massachusetts Licensed Forester

[REDACTED], Cummington, MA 01026

For my comment I would like to present a series of quotations from *The Illusion of Preservation: A Global Environmental Argument for the Local Production of Natural Resources* by Mary M. Berlik, David B. Kittredge, and David R. Foster, Harvard Forest Paper No. 26, Harvard Forest, Harvard University, Petersham, MA; 2002:

“The United States and other affluent countries consume vast quantities of global natural resources, but contribute proportionately less to the extraction of many raw materials. This imbalance is due, in part, to domestic attitudes and policies intended to protect the environment. Ironically, developed nations are often better equipped to extract resources in an environmentally prudent manner than the major suppliers. Thus, although citizens of affluent countries may imagine that preservationist domestic policies are conserving resources and protecting nature, heavy consumption rates necessitate resource extraction elsewhere and oftentimes under weak environmental oversight. A major consequence of this ‘illusion of natural resource preservation’ is greater global environmental degradation than would arise if consumption were reduced and a larger portion of production was shared by affluent countries. Clearly, environmental policy needs to consider the global distribution and consequences of natural resource extraction...

“Many management options, tax policies, conservation measures, and marketing approaches for ‘green’ products exist for consideration by those with authority to make decisions about land management or public policy. But the most crucial change is undoubtedly one of philosophy and practice. Mainstream environmentalist ideology must embrace multiple uses of the forest including harvesting --- and local citizens must consider the use of resources in their own backyard while maintaining a keen awareness of the global environment...

“Such U.S. domestic environmental protection may exert profound, though often unintended impacts on the global environment. According to Sohngen (SAF, 1999) ‘North America currently produces 35 percent of global timber. Conserving only 5 to 10 percent of timberland in a region that supplies such a large proportion of global harvests will increase harvests elsewhere, including tropical forests that are at present inaccessible.’ A recent study found that approximately one hectare of *primary* forest (i.e., forest that has never been harvested before) in Asia, South America, Africa, and Russia is logged for every 20 hectares of forest protected from harvest in North America and Europe (Sohngen, et al., 1999)...

“To consider further the *Illusion of Preservation* and a global strategy for sound resource management we focus on Massachusetts, the eighth most forested state in the nation (by area), and an affluent region with consumption rates that are among the highest in the U.S. Forest harvesting rates are relatively low in Massachusetts and the vast majority of local wood needs are met through imports. Environmental concern is high throughout New England, and ironically, though not surprising, the citizens of Massachusetts have little interest in seeing ‘their’ forests harvested for wood products. A recommendation for more intensive management of these forest resources is certain to have a mixed and largely negative reception.

“Could Massachusetts balance more of its wood consumption with environmentally sustainable production? ‘Yes’ says William Libby of the University of California, but the greatest challenge will be getting “well-intentioned people to understand that their decision to not cut wood locally often does great damage to the things they value someplace else’ (Libby, 1999)... The challenge may be to educate these individuals about the global consequences of their decisions and to expose the illusion of preservation...

“Limited, and often poor forest management, coupled with a prosperous standard of living suggests that Massachusetts has embraced the ‘illusion of preservation.’ International comparisons highlight the consumption-production disparity. Massachusetts is comparable to Germany, Switzerland, Japan, and France in forest cover and the ratio of human population to forest area. Yet, assuming that U.S. averages apply to Massachusetts (probably a conservative assumption, given the state’s high standard of living), per capita consumption is 3 to 4 times the level in these countries. Meanwhile, Japan (a wood-importing nation) harvests nearly 5 times the wood volume per hectare of forest than Massachusetts, and Germany’s harvest rate is 17 times greater. As in most of the U.S., there is little connection between lifestyle and resource production in Massachusetts...

“What might be the ecological consequences of much more intensive forest management in Massachusetts? Could this be accomplished in a fashion mindful of public concern for the local environment while also aiding the global environment?”

“In broad theory, but certainly not in all practice, Massachusetts is well ahead of the Northwestern and Southeastern U.S., British Columbia, and other major source areas in terms of regulatory oversight of cutting practices for public and private land (Kittredge, et al., 1999; Ellefson and Chang, 1994). In Massachusetts, environmental oversight of harvesting is provided by: A forest cutting practices act, a state endangered species act, a wetlands protection act, a rivers protection act, an old-growth policy, and required programs for both forester and logger licensing...”

“In contrast to most states, Massachusetts’ Forest Cutting Practices Act restricts harvesting to licensed timber harvesters. This requires knowledge of all regulations and an average of three contact hours of continuing education annually. Similarly, professional foresters require a license based on formal education from a Society of American Foresters accredited university program, and several years of professional experience, defined by regulation. Both licenses are revocable if regulations are violated. If properly applied with forester supervision and environmental oversight, harvesting can be ecologically sustainable and environmentally sound.

“The resiliency of the northern temperate forest makes it well-suited for forest management. Following harvesting, planting is not required and forest cover quickly re-establishes, as evidenced by rapid regrowth after nineteenth century agriculture, the 1938 hurricane, and repeated episodes of logging and fire. Gentle topography and rapid succession minimize erosion and nutrient loss. Importantly, the vigorous aggrading forests that develop following harvest retain nutrients in the ecosystem and store large amounts of carbon (Vitousek and Reiners, 1975; Borman and Likens, 1979).

“Although logging is often insincerely legitimized as promoting wildlife habitat, it may be an important tool for managing biodiversity. For example, careful long-rotation logging can result in many qualities of mature and old-growth forest while providing some control over species composition, levels of standing and downed wood, and diversity of stocking. Many of the most rapidly declining species in the northeast are associated with early successional habitat: grassland, shrublands, and young forestland that were more abundant in the nineteenth century. Management can be used to maintain such landscapes or to enhance the particular species such as oak, which is valuable for wildlife, as well as timber. In like fashion, any decision not to harvest promotes a specific habitat type...”

“Can Massachusetts meet all its consumptive needs for wood locally? Not realistically. Can Massachusetts reduce its use of wood and its substitutes? Vastly. Can Massachusetts’ forests contribute more to meet local wood demand on a sustainable basis? Absolutely. In so doing, are there global environmental benefits to be realized? Yes.

“Currently there is no environmental ethic focused on meeting wood needs locally and little criticism of consumption behavior. Instead, an anti-logging ethic reigns and degradation of the global environment ensues. A new environmental effort is needed to expose the illusion of preservation. This effort will depend primarily on greater discussions concerning the ethical implications of excessive

consumption joined with indiscriminate protectionism. The message could become stronger and more locally relevant in the context of programs that reduce wood use and encourage ecologically sound harvesting.

“Removing forestland from the productive timber supply can have unintended consequences beyond the woodlot. The best management strategies today are those based on informed decisions --- not only about the land, productivity, and objectives --- but based also on regional, national and global environmental, and social consequences. This notion applies to a family considering options for their land, a land trust discussing alternatives for a newly acquired piece of property, a community studying alternatives for municipal holdings, even state and federal governments considering the management of public forestland. It is not the intention of this paper to promote the intensive production of timber on all forested lands, but to make a case for a bold reduction in wood use and a judicious and sustainable increase in locally produced wood.”



From: Stone Family [REDACTED]

Sent: Sun 2/21/2010 10:00 PM

To: MA Office Disp Resolution

Cc:

Subject: comments on FFVP

Attachments:  FFVP comments 022110.pdf(154KB)  ATT1834821.txt(74B)

[View As Web Page](#)

Dear MODR staff,  
Attached is a PDF copy of my comments on the FFVP. I will send a paper copy with my original signature if you wish. Please let me know if you need it.  
Sincerely,  
Janice S. Stone

---

<<FFVP comments 022110.pdf>> <<ATT1834820.txt>>

February 21, 2010

DCR FFVP  
c/o MODR  
UMass Boston  
100 Morrissey Blvd, M-1-627  
Boston, MA 02125

Re: Feedback on TSC Draft Recommendations

Dear TSC members,

I have read the entire draft document including the annexes, and attended Public Forums in North Adams and Amherst. I would like to congratulate you on a thoughtful, well-written report and the professional way the forums were handled. Overall I think the Recommendations are good, but offer some general and specific comments below.

**General Comments:**

As a resident of Massachusetts, forestland owner, and someone who appreciates our state forestland for many of the values it offers, I support the key elements of the recommendations, especially the emphasis on forest stewardship, designation of reserves, and of having three zones for different types of usage.

The report reads very well and does a good job explaining most of the elements, but it does need a Definitions section, so that all can agree on and understand the terminology. Some of the terms that should be included are: small patch, bioreserve, forest (how tall, how much canopy), forested land (for GIS purposes), forest management, forestry, forest stewardship, commercial harvest, recreation, Biomass, FSC Certification, Chapter 132, early successional habitat, wilderness, Old Growth, uneven-aged management, even-aged management, sustainable forestry and OCR.

There seems to be quite a divide between those who believe forest should be managed in order to be healthy and productive, and those who believe a forest left to grow naturally can be valuable and productive as well. I would tend toward the latter, but do not object to some areas being managed for timber and other forest products if it is done well. I do believe we should include protection of old growth forest, and allow places (reserves) where more old growth can develop. I offer this quote from Yale School of Forestry & Environmental Studies Professor Emeritus of Silviculture David M. Smith, from his textbook The Practice of Silviculture:

**“The most magnificent forests that are ever likely to develop were present before civilization and grew without human assistance.”**

If this renowned expert on silviculture can write that, I think people in charge of our state forest should take it to heart in the debate over reserves and what management is needed.

I don't know if any of us have the expertise to determine what percentage of forest should be in the forest reserve zone. What would the difference between what you are proposing and the 80% suggestion look like? How dramatic a difference in 100 years? I would rather see fewer reserves with more protection than more land and less protection from human impact.

I think the forest reserves should be "managed" by the hands-off approach mentioned in various places in the document. No vehicles, no habitat manipulation for rare species or early successional habitat or other reasons. Areas that "need" manipulation should not be put into a different category from the start. One of the potential "forest reserves" mentioned for manipulation is Myles Standish State Forest. If the rare species habitat management requires fire, cutting and other drastic manipulation of the forest, then it should be called something else, such as a Bioserve or Ecological Reserve. Forest reserves should be to protect forests from human impact, allowing them to develop naturally. If the forest reserves are not left alone, then I don't know if I would agree with the rest of the Future Forest Vision Plan.

I think it will be very important to have local public input as decisions are made as to which properties fall into which zone, and for the future acquisitions.

I also think the DCR should be starting right now on a public relations campaign to counteract the negative visuals presented by some groups to timber harvesting. This report is good, but it cannot compete with photographs and site visits. The DCR, if they believe in the small patch clearcuts and other forest management methods in their present management plans, should show photos on their website of the positive effects. For instance, examples of regeneration in clearcut patches and thinned areas after 1, 5 and 10 years. They could provide maps showing the location of these sites as well as an explanation of what was done and why, so people could go out and visit them and learn more about the management practices. The foresters, loggers and private landowners who are speaking in favor of continuing harvesting should also be able to present some examples of sites that show it in a favorable light. Some people might be surprised how quickly the forest can recover from some harvesting.

### Specific Comments , identified by line numbers.

#### II Overview of Massachusetts Forests and Parks

558 The statewide maps do not come out well when printed or copied in B&W. Perhaps a map on a separate page would have allowed a larger size and better resolution for viewing.

560 I would be hesitant to count land the DCR oversees in Conservation Restrictions as permanently protected land, unless the CRs are in perpetuity and there is regular monitoring to see that the private land is not misused. What zone would this type of forest be included in?

571 same comment at 558.

5954-596 The importance of the DCR forestland as habitat for 67% of the rare species in MA reinforces the importance of protecting our state forest from over-cutting or misuse. It is important to establish the reserves on these priority natural community types and habitat.

615-619 It is very important to protect the largest (1% and 10%) interior forest blocks as reserve forest or wilderness land.

### III A Vision for Massachusetts Forests in 2110

676-677 I agree that the forest reserves should be permanently protected by legislation. I would think a mechanism like Article 97 would be appropriate.

685 Note description of forest reserves as “quiet refuges”. That would not be possible if snowmobiles are allowed on them. They ruin the peace and quiet, leave trash, and pollute the air. **No Snowmobiles on forest reserve lands!** It would be more than enough to allow them on some parklands and woodlands.

### III Recommendations of the Technical Steering Committee (should be numbered IV)

727 I am skeptical of where the estimate of 63% of the state being in forest comes from. If it is through automated classification of orthophotography, then it surely includes residential areas and roadways with some forest canopy. While that might be okay to include for birds and some other wildlife use, it is not really forestland that provides many of the services you mention, and should somehow be subtracted. Ideally you would probably want to identify forest on undeveloped parcels. It could be that we are closer to the 50% figure already. How do we get very accurate data for our baseline information?

766 One participant at the Amherst Forum suggested the use of the phrase “ecosystem values” rather than “ecosystem services” in the document. I agree with his idea. Values seem like a better term to describe what we are trying to protect. Services sounds too commercial.

775-782 I strongly agree with this paragraph, and the importance of recognizing the public trust.

833-834 I think the idea of a Commissioner of Forest Stewardship is a good idea.

### Recommendation 1

921 I think it is very important that there be some system in place to monitor how things are going, and if corrective actions or changes in the plan are necessary to achieve the goals.

944 At one time some of the forest at Mt. Toby had demonstration plots with signs explaining the type of management performed on different areas. This was interesting and informative, and might serve as an example for other areas. The plots were located along trails so that many people out for a walk saw them as well.

### Recommendation 2

962-964 I support this recommendation. It does not mean that there should be no forest management, just that it be done following Best Management Practices.

1010 It is important that the Commissioner have a good background in ecology and forestry.

### Recommendation 3

Based on the reactions I heard at the two forums I attended, I think it might be wise for DCR to back off on proposing new controls or restrictions on private forestry lands.

1046-1047 I do not agree that presently private forest landowners do not receive compensation for leaving their land in forest. They are eligible for a significant discount on their property taxes every year through enrollment in Chapter 61, and one can earn income from any timber or firewood sale.

1054-1061 I am not sure of the viability of the idea for legislation for “no-net loss” of forest canopy, acreage or services. Just as with wetland banking, the replacement area does not provide the same functions and values since it is recently created and has not developed the biodiversity of the mature area lost. New stands of fast growing replacement trees such as poplar or red maple won’t replace the ecosystem services/values of a mature oak forest for example. How would developers provide areas of “comparable” value except by buying private forestland, and what if there is none available within the same general area for sale? How far away can the replacement area be? I think the option to buy or create replacement forest will not stop loss of forest to development, it will just result in a loss of more farmland for replanting. How do we balance loss of one land cover and use with another? I just don’t think this will work.

1090 What are the revisions about that would pertain to stewardship? This was mentioned in one of the public forums, but not described. How would it improve things?

1097 Good idea., and should have been started long ago.

1106 Good idea. Training and access to simple GIS programs would be important.

1158, 1161 Assume this covers Chapter 61B as well, since that is usually forested land, and would be providing many of the same values/services. I don’t think the state tax credit is necessary, since there is already a significant reduction in local property taxes.

1175-1177 I do not agree that the role of the service foresters should be reduced, but rather believe they should continue to approve all Chapter 132 plans and monitor the work. It is important that the service foresters are there for *consistency* across the region and state. Some of the problems recently highlighted by timber harvesting opponents may have happened because the service foresters did not do a good enough job of reviewing the plans before approval, or monitoring the work. I think we need a stronger role for service foresters, not a weaker one. Continue to allow private landowners to still submit their own Chapter 132 plans, which seems to be important to some landowners, but make sure the plans will be properly reviewed by the service foresters and revised if necessary.

#### Recommendation 4

1267 Groundtruthing is very important; important decisions should not be based on GIS data alone.

1343 I think it is important to emphasize to those opposed to the forest reserve idea for economic reasons that it is likely to be only 6-8% of all the forestland in the state that will be affected, a small amount.

1346 I support a wilderness designation to appropriate areas, such as old growth forest.

1357-1358 I strongly support creating a permanent legal protection on the forest reserve land, such as Article 97.

1400-1408 I am concerned that the ceiling is too low for the parkland acres, when one considers some of the parkland areas that still need more acreage added for protection and expansion of recreational opportunities. For instance, the Mount Holyoke Range still has many more acres of unprotected land that will hopefully be acquired by DCR over time. Also the Connecticut River Greenway and Mount Tom, and I am sure many other important “park” areas in the state. Can it be stated in the plan that the acreage can be expanded above the 90,000 acres to add or to acquire new land when opportunities arise to fill in or augment existing significant parkland areas such as these?

1438-1450 I am concerned about allowing clearcutting of forest to create early successional habitat. Existing valuable and productive forest already providing a suite of ecosystem

services/values should not be clearcut for early successional habitat. Old fields, abandoned farmland and areas to be cleared of invasive species, or because of insect or weather damage should be used instead. Because these sites or conditions may not be as available, I would suggest using the smaller acreage number, with 4500 acres being re-cleared every 15 years to maintain the habitat type.

1471-1472 I support the concept of patch reserves for special sites within any of the zones.

1531-1534 I suggest that there be a buffered edge in the forest reserves where intervention for fire suppression, insect control or invasives control can be used when necessary to protect adjacent properties, but the interior or core of these reserves be left alone except in very unusual situations. Lengthy discussions would still be required to set parameters for when and how intervention into the interior of the forest reserves may be done.

#### Recommendation 5

1590-1595 I strongly support the recommendation for the least amount of human intervention in the forest reserves. The other zones will be manipulated, leave this one alone.

1621-1635 I repeat what I stated above for 1531-1534, that actions such as habitat manipulations for rare habitat or invasives, soil stabilization, pathogen control or prescribed fires be limited to an outer buffer, with no intervention for the inner core.

1651-1652 I agree that people should have access (walking, cross country skiing) in the reserves, but it should be limited to these very low impact types of use. *No motorized vehicles.*

1665-1667 I strongly disagree with the idea of allowing snowmobiles or horses on forest reserves. Snowmobiles are noisy, smelly and disturb the peace and quiet for people and animals. Horses leave droppings and damage soft soils on sensitive trails. The problem is not one or two horses, but the cumulative impact of groups of horses over time. Both snowmobiles and horses create too much impact. Leave them to the woodlands and parklands.

1701-1706 I disagree with the concept that some forest reserves will require active and continued management. The example cited, the pitch pine/scrub oak lands of southeastern MA, require continued management including cutting and burning in order to maintain the scrub oak shrubland and grassland communities for rare species habitat. Those portions of Myles Standish, the Montague Plains and MA Maritime Reservation in Bourne that include this habitat type may be better designated as a special "Ecological Reserve" due to the understanding that they will require specific intensive management considerations. Those areas that are not part of the active habitat management plan can be forest reserve.

1712-1714 I strongly agree with the concept that "reserves management should allow natural process to determine the long-term structure, composition, function and dynamics of the forest to the maximum extent possible." That is why the significant human manipulation of the vegetation in parts of Myles Standish state forest is not consistent with the concept of the forest reserve, and should be given another special designation.

#### Recommendation 6

No particular comments.

#### Recommendation 7

1918 I wonder if anyone can actually determine sites that have "never" been pastured or cleared for tillable crops. You might be able to identify these sites by soil analysis, but certainly not from existing GIS data and maps. I understand and have used the Harvard Forest 1830s forest

maps, but they only show approximate areas of forest at that date and time. To say “never” is taking more from those maps than can be determined. I would suggest rewording to “probably never pastured” and “probably have always been in forest growth”. We have no specific information from the 1700s or earlier.

2016-2026 I support these guidelines for identifying trees and areas to protect in managed woodlands.

2101-2106 I don’t agree that the foresters should be treated like school children and made to write an essay on the important responsibilities of public land foresters. That is humiliating and unfair to those that have done a good job. Professional degrees, licensing, training of the staff and monitoring of sites should be enough. Management plans and policy should reflect what DCR decides to do for forest management.

2110-2112 **I strongly oppose any use of state forest for biomass fuel.** I think the FFVP should specifically prohibit the use of state forestland for biomass fuel. It would be a terrible waste of our common wealth. I believe the biomass plants will be deleterious to air, soil and water quality and will consume too much of forest for small amounts of energy. The public needs to know that there will at least be forest remaining as a refuge on public lands.

2136-2142 As stated in general comments above, I think the DCR should start doing some outreach and education programs right now, showing good examples of managed forests.

2162-2170 I think the buffer for trails is a good thing.

#### Recommendation 8

2258-2260 I would add to this list of types of expertise those with GIS and data analysis. These will be important for determining possible acquisition areas, monitoring and management.

#### Recommendation 9

2446-2452 I strongly suggest DCR reach out to local Conservation Commissions and Open Space and Recreation Committees in helping to determine the proposed land allocation. It is important to get local input from both residents and board and committee members. This could be a good process for the towns as well as DCR, and an opportunity to work together.

2469 The diagram does not work very well, at least for me.

#### Recommendation 10

2639-2647 I agree it will be important to have some forms of monitoring to make sure that forest reserve lands are not being abused, encroached upon etc.

#### Annex 1

2806-2808 I think DCR should work on creating a simple GIS program to distribute to foresters or provide as an on-line feature, where foresters can look up GIS information on rare species habitat, vernal pools, wetlands, scenic roads and other features that should be included on cutting plans, and create a base map to which can be added other features including property and stand boundaries.

2847-2849 Something needs to be done about illegal ATV use on public land, in wetlands and vernal pools and other sensitive areas.

2952-2953 I think foresters should be considering the aesthetics of the site and landscape design. Create scenic vistas, protect vernal pools, highlight distinctive trees, rock outcrops or old foundations in the course of marking the trees for forest management.

Annex 5

3580, 3593, 3624 Wish these maps were larger and clearer in B&W at normal page scale.

3689 I wonder where the Quabbin Reservoir lands fit in this description of identifying potential forest reserves. I understand watershed lands were not included in this Vision Plan, but obviously they will be an important consideration in the DCR forest reserves for the future. I do not see Shutesbury state forest listed anywhere under forest reserves or parkland. Will it be incorporated into the same forest reserve as the Quabbin land? The Shutesbury section of Quabbin, including the state forest, is one of the top 1% interior forest blocks, so it should be addressed. I repeat my idea of putting at least part of Myles Standish into some other category than forest reserve.

4019 What are you going to do about using this model without updated and digital soils data for Franklin and Plymouth counties?

Annex 6

4551-4553 **No snowmobiles should be allowed on forest reserve lands.**

DCR Management Guidelines for Forest Reserves (3) C. No snowmobiles should be allowed in forest reserves. Habitat manipulation including prescribed burns by NHESP or anyone else should not be part of the forest reserves. It is contradictory to the statement on lines

4561-4562 **“To the greatest degree possible, allow natural disturbance processes to determine the structure and composition of the forest ecosystem.”** Follow that guidance in the forest reserves.

Thank you for the opportunity to comment on the FFVP.

Sincerely,

*Janice S. Stone*

Janice S. Stone  
Shutesbury MA  
Conservation Administrator  
Professional Wetland Scientist  
M.S., Wildlife Biology

From: Steven Wood [REDACTED]

Sent: Sun 2/21/2010 11:05 PM

To: MA Office Disp Resolution

Cc:

Subject: comments on Forest Visioning

Attachments:

[View As Web Page](#)

2/21/2010

Hello,

I would like to submit the following comments on the Forest Futures Visioning Process and the Draft Recommendations of the TSC released 1/22/10. My name is Steven J. Wood, MA licensed forester #257. I have been a forester for 26 years, having worked for a large private landowner/sawmill, as a private consulting forester, and most recently as a state management forester, although these comments are my own opinion. I also own a small woodlot and am an active user of public land for fishing, hiking, cross-country skiing, wildlife viewing and just plain enjoying nature. I attended the Amherst meeting on 2/9 and have read through most of the documents on the DCR site regarding Visioning. I have also received copies of several emailed comments to you and for brevity will refer to a couple of these where appropriate.

First, I would like to thank the members of the AGS and TSC for their hard work on this controversial topic. I'm sure they all realize how difficult it will be to reach any kind of consensus on a project of this scale and emotion. The discussions started will hopefully make decisions easier for future managers.

In the intro section titled "Shifting the Forest Management Paradigm," 2nd paragraph, I agree with the statement "Forest products are just one among many ecosystem services, and must not dominate or diminish the others." This is a core principle of multiple use management and is nothing new. Any of the other ecosystem services could and should be inserted in place of forest products in the statement. I think one of the problems is that since timber harvests are such a noticeable change to the forest and the logs and other forest products are the most noticeable by-product, the public often assumes this is the only or the main object of the treatment even though this is not always the case, particularly on public lands. There are always wildlife habitat, forest composition and regeneration impacts along with a variety of other ecosystem services that a skilled manager could be trying to manipulate, most often multiple ones.

Rec. 1: Caution needs to be taken in elevating the role of one or some ecosystem services over others on state land in particular without considering the impacts in a local context. Wood products should be a primary management goal for DCR lands as long as society has a demand for them. To expect other countries to supply them for us is elitist or worse. And to have "old growth/spiritual experiences" as primary in their place could cause a reasonable person to question the motivation of some on the committee.

Rec. 2: This is good and I feel it is consistent with current evolving public policy. I'm not sure a

new layer of bureaucracy is the answer, however. Instead, I would suggest a communications officer to distribute factual info on forest management and facts and goals of state lands management. The Chief Forester position with the Bureau of Forestry needs to be filled.

Rec. 3: I don't believe public lands should be included in this vision particularly without having notified the stakeholders better. Bill Hull's email of 2/4/10 addresses this and the requirement of use of a licensed forester and I agree with all that he said on this section.

Rec. 4: I agree with core principle of this section but feel the woodlands acreage should be 2/3rds of total with reserves at 10%. Active forest management should not be marginalized especially considering our growing population and demands for forest products and energy supply deficit. I would love to see 100,000 acres of wilderness in MA. I just don't think it is prudent use of the land and with the impacts man has already had on the ecosystem I don't think it is possible as the TSC sees it. Just ask Bruce Spencer how much understory the Quabbin had even 15 years ago after they had only a 50 year or so period of no hunting and limited timber harvesting. The effects of this experiment on diversity and forest regeneration are still visible in Pelham and the Quabbin Park (where hunting is still not allowed). For better or worse we need to recognize that man has changed the ecosystem and there is no going back to the way things were. And even if we could would it be pre European settlement?, pre historic?, what would replace elm and chestnut? etc.

I also think before the reserve acreage is final the actual acreage already locked up needs to be determined accurately, and include land owned by NGOs such as Audubon Society and The Nature Conservancy which is not likely to be harvested, along with land too steep or wet or otherwise inaccessible to logging or other management. My guess is this acreage is very similar to what was mature (old growth?) forest around 1800.

Rec. 5: Besides concerns mentioned above, input from a broader range of stakeholders, especially sportsmen and town officials from affected towns, needs to be heard. Also any management on these acres as on the other 2 classes needs to be science-based (not political or emotionally based). Bill Hull also made some good points on this item.

Rec. 6: Limited timber management should be allowed on Parklands where possible to help pay costs of maintaining recreational facilities and accomplishing management goals such as creating trails and wildlife habitat enhancement, especially for endangered species whose habitat is varied and occurs throughout the state including heavily populated areas. Our population centers are where demonstration forests could do the most good both for education and supplying a wooded recreation area. Timber management wouldn't be a priority here and would be more controlled with additional input from public such as user groups.

Rec. 7: The full range of silvicultural tools needs to be allowed. Choices shouldn't be limited by changing and fickle politics or public perception but by the best science available at the time. Consultation between the various public resource management agencies and divisions should be encouraged and enabled. If the majority of the public doesn't like trees being cut but demands wood products then obviously something has to give. Public input should give general

guidelines, science should decide the specifics of when, where, how much etc. based on forest type, site specific conditions, management goals, endangered species habitat etc. Both even and uneven-age management should be used where appropriate along with biomass harvesting. If you are going to legislate every aspect what is the point of hiring a professional? If my hands are tied I sure don't want to be held accountable for the results.

Rec. 8: I think this is what DCR has been trying to do, I'm fine with this.

Rec. 9: Agree with this too. However, management decisions should be driven by the best available science. The day to day, detailed decisions should be left to professionals and not dictated by public participation. It is unlikely that all stakeholders will agree on even a part of the management of DCR land so care needs to be taken not to waste public resources on endless planning that never accomplishes anything.

Rec. 10: Funds definitely needed to accomplish this, good luck finding them in current environment.

Thanks for the opportunity to comment on these recommendations.

Sincerely, Steven J. Wood

From: [eevee111@](mailto:eevee111@) [REDACTED]  
MA Office Disp Resolution: [REDACTED]  
To: [REDACTED]  
Cc:  
Subject: attn: DCR Forest Futures Visioning Process Comments  
Attachments:

Sent: Sun 2/21/2010 11:30 PM

[View As Web Page](#)

DCR Forest Futures Visioning Process Comments  
c/o MODR University of MA Boston  
100 Morrissey Blvd., M-1-627  
Boston, MA 02125  
Via: MODRDCRFFVP@umb.edu

Dear Madam or Sir:

I am writing to you regarding the Massachusetts Forest Futures Visioning Process.

Massachusetts currently controls the activities on about 550,000 acres of state publicly owned land, or 11% of its land area. At a time when the world is experiencing deforestation, loss of habitat for wildlife, soil erosion and global warming, I would like the land that is owned by the public to be managed and cared for in a way that contributes the most to doing our share of environmental protection.

A recent University of Vermont study suggests that the best way to maintain carbon sequestering on forested land is to refrain from any harvesting. Comments in the FSC report have concluded that the majority of Massachusetts

residents overwhelmingly oppose commercial harvesting on state owned land. Also, as an opponent of biomass power plants, I am concerned about a study commissioned by the state which shows that 56% of likely wood supply available to be burned in these power plants would come from state forests if harvesting is to be continued.

The current recommendations of the Forest Future Vision Process would put aside only about 216,000 acres of Massachusetts land area of 5,000,000 acres in parks and reserves that would be off limits to commercial logging. This would amount to only 4% of the total land in the state 7 % of Massachusetts' forested land. I am requesting that all 550,000 acres under State jurisdiction be set aside from commercial timber harvesting in order to preserve and protect wilderness areas, fish and wildlife habitat, clean water, clean air, tourism income, carbon sequestration, scenic beauty and recreational opportunities in the 3rd most densely populated state of 6,000,000 residents.

Protecting these 550,000 acres would amount to protection for only 11% of the total land area and only 17% of the forested land in Massachusetts which would still provide even less protection than neighboring New York State which has set aside 20% of all of their forestlands in parks and reserves where logging is prohibited. Additionally, considering that the timber program loses money, protecting all these state public lands would be the most prudent economic as well as ecological action.

It seems that at a time when we are asking third world countries to protect 25-50% of their forested land for global carbon sequestering, protecting state public lands would be a modest attempt of doing our fair share. After viewing the photos at [www.maforests.org](http://www.maforests.org), it is clear a major corrective response is needed now to protect these scarce state public lands for current and future generations.

Please protect all state public forests, watersheds and parks from commercial timber harvesting.

Kimberly Feener

[REDACTED]  
Topsfield, MA 01983

Include my comments in the official record for this project, but do NOT send me further documents or put me on any mailing lists.